

EXHIBIT "8"

MakingHomeAffordable Document 69-9 Filed 08/08/11 Page 2 of 40
 Program Performance Report Through April 2011

Report Highlights

Nearly 700,000 Permanent Modifications Started

- Homeowners receiving permanent modifications have realized aggregate savings in monthly mortgage payments of more than \$6.3 billion, program to date.
- Nearly 29,000 new permanent modifications reported in April, in line with the six-month average.
- Borrowers in active permanent modifications save a median of \$526, or 37% of their before-modification monthly housing payment.
- Servicers reported over 29,000 new trial modifications, in line with the average for the past six months.
- Of trial modifications started since June 2010, 70% have been converted to permanent modifications.
- Of trial modifications started since June 2010 that became permanent modifications, the average length of a trial modification was 3.5 months, down from 5.2 months for trials started before June 2010.

New This Month: Servicer Assessments

- The Obama Administration sets a new industry benchmark for disclosure on assistance to homeowners with the release of detailed Servicer Assessments. Beginning with this report, Treasury is publishing quarterly assessments of performance by the 10 largest program participants.
- Going forward, Treasury hopes these assessments will also set the standard for transparency about mortgage servicer efforts to assist homeowners.
- For the first quarter of 2011, four servicers have been determined to need substantial improvement. Treasury is withholding financial incentives from three servicers.

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HAMP Activity in First Lien Modifications

HAMP Eligibility		Total
As of Mar. 31, 2011		2,684,832
Eligible Delinquent Loans¹		1,095,151
Eligible Delinquent Borrowers²		1,819,480
Trial Plan Offers Extended (Cumulative)		1,580,034
All Trials Started		29,017
Trial Modifications Canceled (Cumulative)		753,041
Active Trials		135,040
All Permanent Modifications Started		699,053
Permanent Modifications Reported Since March 2011 Report		28,867
Permanent Modifications Canceled (Cumulative)		90,430
Active Permanent Modifications		608,615

¹Estimated eligible 120+ day delinquent loans as reported by servicers as of March 31, 2011, include conventional loans, in foreclosure and bankruptcy.

²With current unpaid principal balance less than \$729,750 on a one-unit property, \$934,200 on a two-unit property, \$1,128,210 on a three-unit property and \$1,403,430 on a four-unit property.

³On a property that was owner-occupied at origination.

⁴On or before January 3, 2011.

⁵Estimated eligible ED+ day delinquent loans excluded.

⁶ FHA and VA loans.

⁷Loans that are current or less than 60 days delinquent, which may be eligible for HAMP if a borrower is in imminent default.

⁸The estimated eligible 60+ day delinquent borrowers are those in HAMP eligible loans, minus estimated cancellations of loans on vacant properties, loans with borrower debt-to-income ratio below 31%, loans that fail the HPI test, properties no longer owner-occupied, unemployed borrowers, manufactured housing loans with bid/charged rates that exclude them from HAMP, and loans where the investor pooling and servicing agreements preclude modifications. Exclusions for DTI and HPI results are estimated using market analysis. As of March 2011, estimate excludes loans that are disqualified from active HAMP trial and permanent modifications.

⁹As reported in the weekly servicer survey of large GSE servicers through April 29, 2011. Bank of America has revised number of trials offered from previous month.

¹⁰Servicers may enter new trial modifications into the HAFA system at record at anytime.

¹¹A permanent modification is canceled when the borrower has missed three consecutive monthly payments. Includes 1,743 loans paid off.

¹²Note: Unless specified, exhibits in this report refer to HAMP first lien modification activity.

Second Lien Modification Program (2MP) Activity

The Second Lien Modification Program (2MP) provides assistance to homeowners in a first lien permanent modification who have an eligible second lien with a participating servicer.

All Second Lien Modifications Started 25,478

Note: Number of modifications is net of cancellations, which are primarily due to servicer data corrections.

Home Affordable Foreclosure Alternatives (HAFA) Activity

The Home Affordable Foreclosure Alternatives Program (HAFA) offers incentives for homeowners looking to exit their homes through a short sale or deed in lieu of foreclosure.

All HAFA Agreements Started¹ 14,893

HAFA Transactions Completed 7,313

¹Servicer agreement with homeowner for terms of potential short sale, which lasts at least 120 days; or agreement for a deed-in-lieu transaction. A short sale requires a third-party purchaser and cooperation of lender beneficiaries and mortgage insurers to complete the transaction. All HAFA Agreements Started include HAFA Transactions Completed.

Treasury/FHA-HAMP Modification Activity

The Treasury/FHA-HAMP Program provides assistance to eligible homeowners with FHA-insured mortgages.

All Treasury/FHA-HAMP Trial Modifications Started 4,261

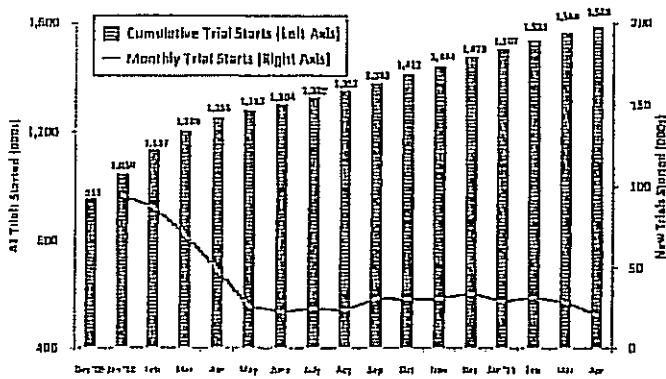
Treasury/FHA-HAMP Permanent Modifications Started 2,739

See Appendix A2 for servicer participants in additional Making Home Affordable programs.

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HAMP Trials Started



Source: HAMP system of record. Servicers may enter new trial modifications into the HAMP system of record along time. For example, 25,011 trials have entered the HAMP system of record since the prior report of June, 20,631 were trials with a first payment recorded in April 2011.

Homeowner Demographic and Modification Characteristics

- Aggregate savings to homeowners who received HAMP first lien permanent modifications are estimated to total more than \$6.3 billion, program to date, compared with unmodified mortgage obligations.
- The median monthly savings for borrowers in active permanent first lien modifications is \$526.06, or 37% of the median monthly payment before modification.
- Of trial modifications started, 79% of homeowners were at least 60 days delinquent at trial start. The rest were up to 59 days delinquent or current and in imminent default.
- The primary hardship reasons for homeowners in active permanent modifications are:
 - 60.7% experienced loss of income (curtailment of income or unemployment)
 - 11.4% reported excessive obligation
 - 2.8% reported an illness of the principal borrower
- Active permanent modifications feature the following modification steps:
 - 100% feature interest rate reductions
 - 59.5% offer term extension
 - 30.5% include principal forbearance

Select Median Characteristics of Active Permanent Modifications

	Borrower	Affordability	Median
Front-End Debt-to-Income Ratio ¹	45.3%	31.0%	\$4,311 per pt ²
Back-End Debt-to-Income Ratio ³	70.0%	62.0%	\$14,700 per pt ³
Median Monthly Housing Payment ⁴	\$1,430.35	\$692.98	\$526.06

¹Ratio of housing expenses (principal, interest, taxes, insurance and homeowners association and/or condo fees) to monthly gross income.

²Ratio of total monthly debt payments (including mortgage principal and interest, taxes, insurance, homeowners association and/or condo fees, plus payments on installment debts, junior liens, alimony, car lease payments and involuntary property payments) to monthly gross income. Families who have a back-end debt-to-income ratio of greater than 65% are required to seek housing counseling under program guidelines.

³Principal and interest payment.

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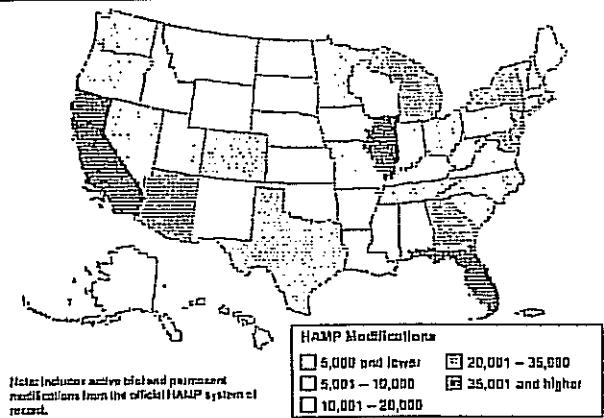
HAMP Activity by State

	Applies to Active Modifications	Per Month	Active Modifications	Completed Modifications	Total Modifications	Completed Modifications	Active Modifications	Completed Modifications	Total Modifications
AK	51	261	312	0.0%	MT	172	655	137	0.1%
AL	869	3,496	4,385	0.6%	NC	2,330	11,190	13,520	1.6%
AR	305	1,318	1,624	0.2%	ND	120	101	124	0.0%
AZ	4,947	28,638	33,665	4.5%	NE	208	826	1,034	0.7%
CA	32,860	146,500	178,450	24.0%	NH	685	2,826	3,411	0.5%
CO	1,619	8,464	10,003	1.4%	NJ	4,361	19,591	23,852	3.2%
CT	1,592	7,703	9,295	1.2%	NM	470	1,936	2,414	0.3%
DC	207	1,046	1,253	0.2%	NV	3,411	15,876	19,067	2.6%
DE	434	1,884	2,318	0.3%	NY	6,797	27,513	34,250	4.6%
FL	17,711	71,853	89,604	12.0%	OH	3,080	13,028	16,708	2.2%
GA	5,130	22,155	27,285	3.7%	OK	360	1,395	1,763	0.2%
HI	513	2,335	2,848	0.4%	OR	1,445	6,620	8,073	1.1%
IA	364	1,545	1,909	0.3%	PA	2,026	12,675	15,501	2.1%
ID	528	2,307	2,835	0.4%	RI	673	3,203	3,976	0.5%
IL	7,155	32,779	39,834	5.4%	SC	1,270	5,750	7,020	0.5%
IN	1,346	5,857	7,303	1.0%	SD	43	237	200	0.0%
KS	357	1,430	1,785	0.2%	TN	1,486	6,235	7,721	1.0%
KY	542	2,305	2,847	0.4%	TX	4,080	15,637	16,717	2.6%
LA	919	3,217	4,136	0.6%	UT	1,155	5,750	6,905	0.9%
MA	3,078	15,303	18,381	2.5%	VA	2,908	14,932	17,840	2.4%
MD	4,049	19,674	23,723	3.2%	VT	115	498	513	0.1%
ME	308	1,670	2,076	0.3%	WA	2,852	11,889	14,741	2.0%
MI	4,110	20,217	24,327	3.3%	WI	1,370	5,985	7,355	1.0%
MN	1,966	10,809	12,055	1.7%	WV	172	929	1,101	0.1%
MO	1,445	6,415	7,060	1.1%	WY	54	317	371	0.0%
MS	500	2,300	2,868	0.4%	Other	746	3,649	2,995	0.3%

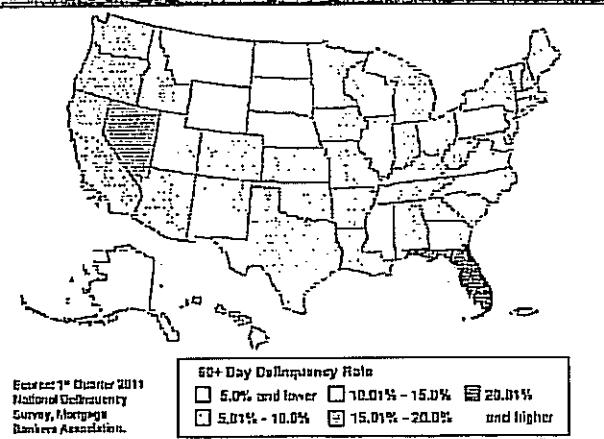
¹ Total reflects active loans and active permanent modifications.

² Includes Guam, Puerto Rico and the U.S. Virgin Islands.

Modification Activity by State



Mortgage Delinquency Rates by State



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15 Metropolitan Areas With Highest HAMP Activity

Metropolitan Statistical Area	Total Trials	Permanent Modifications	Estimated HAMP Activity	HAMP Activity
Los Angeles-Long Beach-Santa Ana, CA	9,838	42,493	52,331	7.0%
New York-Northern New Jersey-Long Island, NY-NJ-PA	8,600	37,374	45,974	6.2%
Riverside-San Bernardino-Ontario, CA	6,619	32,109	38,728	5.2%
Chicago-Joliet-Naperville, IL-IN-WI MSA	6,070	31,724	38,594	5.2%
Miami-Fort Lauderdale-Pompano Beach, FL	7,511	28,786	30,277	4.9%
Phoenix-Mesa-Glendale, AZ MSA	5,079	23,536	27,415	3.7%
Washington-Arlington-Alexandria, DC-VA-MD-WV	3,044	21,125	25,069	3.4%
Atlanta-Sandy Springs-Marietta, GA	4,109	17,891	22,000	3.0%
Las Vegas-Paradise, NV	2,073	12,862	15,726	2.1%
Detroit-Warren-Livonia, MI	2,488	12,244	14,732	2.0%
San Francisco-Oakland-Fremont, CA	2,870	11,390	14,260	1.9%
Orlando-Kissimmee-Sanford, FL MSA	2,601	11,419	14,820	1.9%
Boston-Cambridge-Duxbury, MA-NH	2,169	10,963	13,132	1.8%
San Diego-Carlsbad-San Marcos, CA	2,304	10,411	12,715	1.7%
Sacramento-El Dorado-Arcade-Roseville, CA	2,336	10,336	12,672	1.7%

Note: Total reflects active trials and active permanent modifications.

A complete list of HAMP activity for all metropolitan areas is available at
<http://www.treasury.gov/initiatives/financial-stability/results/MHA-Reports/>

Center of Excellence

Program to Date	April
Total Number of Calls Taken at 1-888-995-HOPE	2,204,638 68,217
Borrowers Receiving Free Housing Counseling Assistance Through the Homeowner's HOPE™ Hotline	1,053,685 32,915

Source: Homeowner's HOPE™ Hotline.

Selected Homeowner Outreach Measures

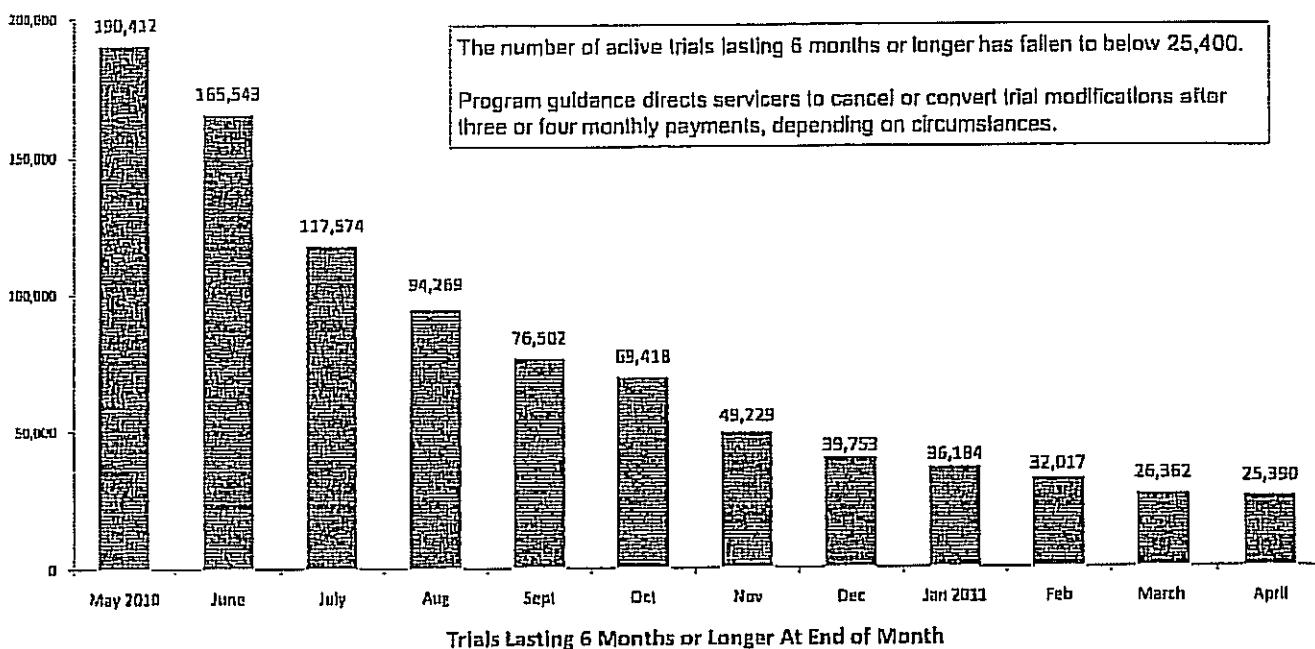
Homeowner Outreach Events Hosted Nationally by Treasury and Partners (cumulative)	53
Homeowners Attending Treasury-Sponsored Events (cumulative)	52,817
Service Provider Collection of Borrowers (cumulative)	7,341,705
Page views on MakingHomeAffordable.gov (April 2011)	2,181,472
Page views on MakingHomeAffordable.gov (cumulative)	117,807,802

* Source: Survey data provided by SPA services. Servicers are encouraged by HAMP to solicit information from borrowers 60 days delinquent, regardless of eligibility for a HAMP modification.

† Total Bank of America, NA, has installed collection numbers from previous month.

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Aged Trials



¹ Active trials initiated at least six months ago. See page 7 for number of aged trials by servicer. These figures include trial modifications that have been converted to permanent modifications by the servicer and are pending reporting to the HAMP system of record plus some portion which may be canceled.

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HAMP Modification Activity by Servicer								
Servicer	Total HAMP Modifications		Completed Modifications		Pending Modifications		Total HAMP Trials	
	Completed Modifications	Pending Modifications	Completed Modifications	Pending Modifications	Completed Modifications	Pending Modifications	Completed Modifications	Pending Modifications
American Home Mortgage Servicing Inc.	42,190	35,443	32,206	21,739	609	3,183	812	21,709
Bank of America, NA ^a	203,445	488,979	386,308	127,554	7,724	45,809	9,695	109,027
ChallMortgage, Inc.	71,845	176,545	130,438	50,880	893	5,811	1,544	45,459
GMAC Mortgage, LLC	30,381	72,801	60,569	43,051	1,092	3,512	82	37,580
J.P. Morgan Chase Bank, NA ^b	160,406	305,693	247,606	95,440	5,843	25,454	2,463	79,516
Lillian Loan Servicing LP	36,369	41,701	36,846	11,187	735	2,297	166	9,205
Ocean Loan Servicing, LLC	36,243	47,219	44,145	33,075	903	4,404	1,016	26,632
OneWest Bank	32,490	88,564	51,501	27,284	968	3,353	264	24,482
Select Portfolio Servicing	8,251	67,301	41,480	21,636	283	1,203	99	16,192
Wells Fargo Bank, NA ^c	137,218	311,911	226,702	96,086	3,650	12,816	1,790	86,235
Other SPA Servicers ^d	102,039	202,143	205,689	97,459	3,376	11,825	2,247	88,303
Other GSE Servicers ^e	154,274	NA	124,184	70,562	2,935	16,113	5,222	63,095
Total	1,095,151	1,019,400	1,500,034	609,053	28,011	135,940	25,380	608,615

^aEstimated eligible 60+ day delinquent borrowers as reported by servicers as of March 31, 2011. Include those in conventional loans:

- In foreclosure and bankruptcy.
- With a current unpaid principal balance less than \$729,750 on a one-unit property, \$834,200 on a two-unit property, \$1,129,250 on a three-unit property and \$1,403,400 on a four-unit property.
- On a property that was owner-occupied at origination.
- Delinquent on or before January 1, 2009.

Estimated eligible 60+ day delinquent borrowers excludes:

- Those in FHA and VA loans.
- Those in loans that are current or less than 60 days delinquent, which may be eligible for HAMP if a borrower is in imminent default.
- Those borrowers with debt-to-income ratios less than 31% or a negative NPV test.

- Owners of vacant properties or properties otherwise excluded.
- HAMP Trials and Permanent Modifications unavailable from HAMP (exclusion effective March 2011).
- Unemployed borrowers.

Exclusions for OTI and NPV are estimated using market analytics.

^bAs reported in the weekly servicer survey of large SPA servicers (through April 20, 2011). Bank of America has reported number of trial offers extended from previous month.

^cAs reported into the HAMP system of record by servicer. Excludes FHA-HAMP modifications. Subject to adjustment based on servicer reconciliation of Helocine loan files. Totals reflect impact of servicer transfers. Servicers may enter new trial modifications into the HAMP system of record at any time.

^dThese figures include trial modifications that have been converted to permanent modifications by the servicer and are pending reporting to

the HAMP system of record.

^eBank of America, NA includes Bank of America, J.A., BAC Home Loans Servicing LP, Home Loan Services and WaMu Credit Corporation.

^bJ.P. Morgan Chase Bank, NA includes EMC Mortgage Corporation.

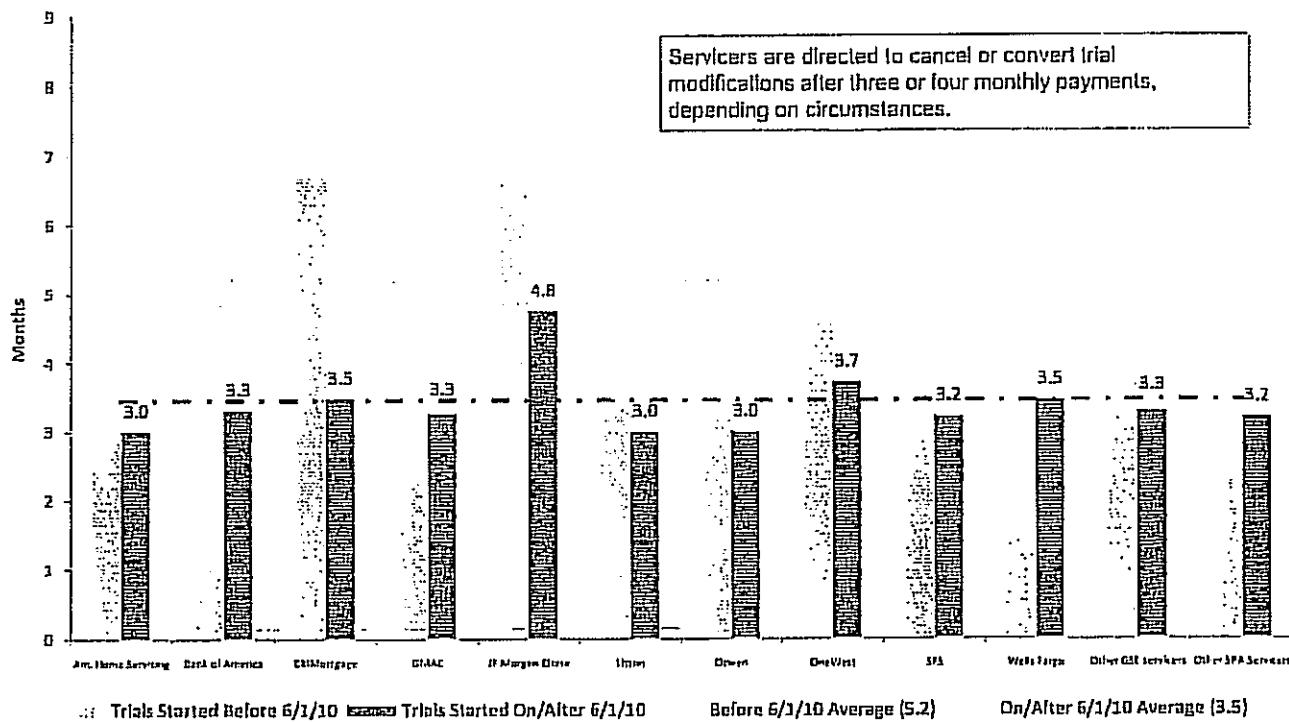
^cWells Fargo Bank, NA includes all loans previously reported under WaMu/Merger, FSB.

^dOther SPA servicers are entities excluding the 10 largest servicers, by cap amount, that have signed participation agreements with Treasury and Fannie Mae. A full list of participating servicers is in Appendix A. New trials reported since March includes the impact of consolidating some servicers that were listed in the March report.

^eIncludes servicers of loans owned or guaranteed by Fannie Mae and Freddie Mac. Includes GSE loans transferred from SPA servicers.

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Length of Trial Upon Conversion



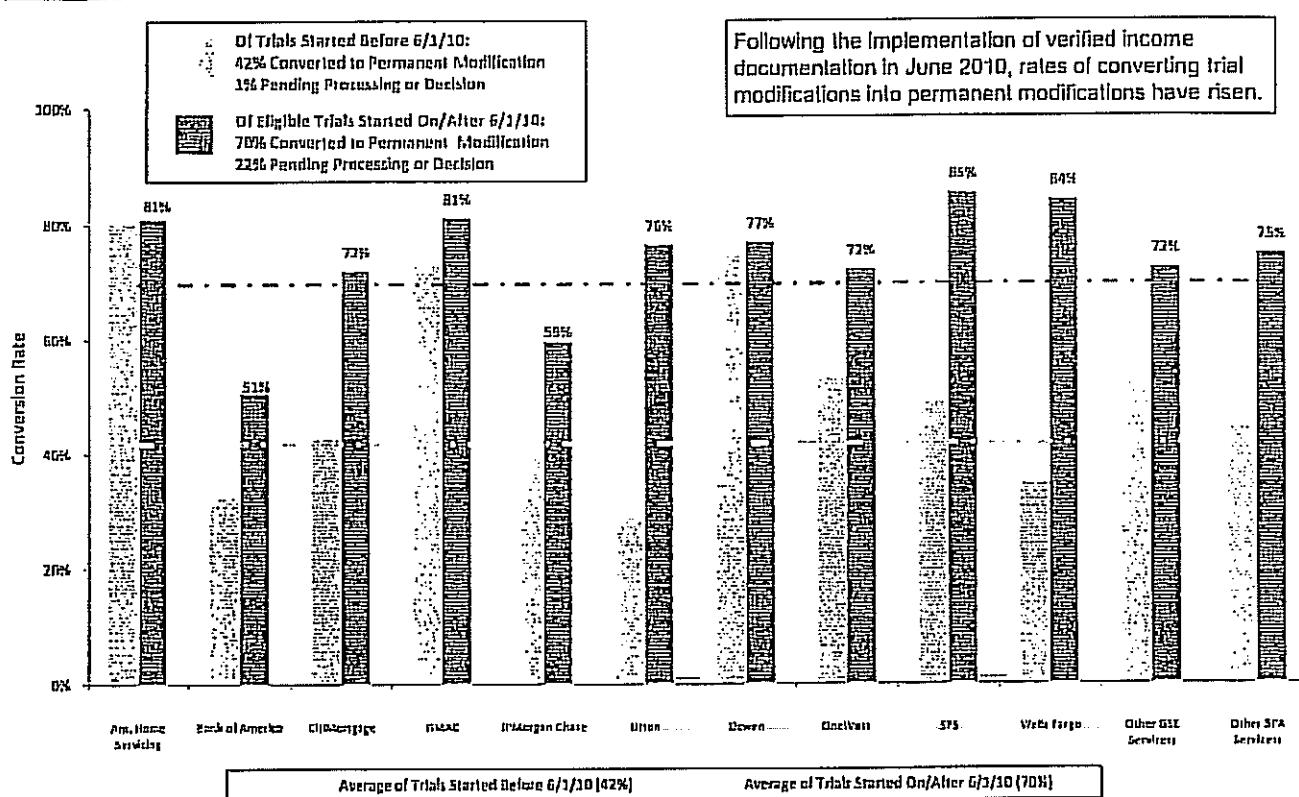
¹For all permanent modifications started.

Note: Per program guidelines, effective June 1, 2010 all trials must be started using verified income. Prior to June 1, some servicers initiated trials using stated income information.

Making Home Affordable Service Results

Program Performance Report Through April 2011

Conversion Rates



Note: Per program guidelines, effective June 1, 2010 all trials must be started using verified income. Prior to June 1, some servicers initiated trials using stated income information.

¹ As measured against trials eligible to convert—those three months in trial, or four months if the borrower was at risk of imminent default at trial modification start. Permanent modifications transferred among servicers are credited to the originating servicer. Trial modifications transferred are reflected in the current servicer's population.

Making Home Affordable Servicer Results

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Disposition Path Homeowners In Canceled HAMP Trial Modifications Survey Data Through March 2011 (10 Largest Servicers)

Servicer	Homeowners Whose HAMP Trial Modification Was Canceled Who Are In the Process of:										Total (As of March 2011)
	Action Not Allowed— Bankruptcy	Action Pending*	In Process	Borrower Current	Alternative Modification Plan	Payment Plan	Short Sale/ Deed-In Lieu	Foreclosure Starts	Foreclosure Completions		
American Home Mortgage Servicing Inc.	433	64	365	2,237	31	115	223	546	67	3,879	
Bank of America, NA ^b	43,395	16,408	29,114	71,745	475	3,347	14,661	31,044	7,076	208,065	
CitiMortgage Inc.	17,140	9,738	5,656	29,450	1,008	3,480	3,767	9,631	2,091	71,941	
GMAC Mortgage LLC	13,610	440	1,313	5,941	217	364	1,063	3,676	1,326	13,510	
JPMorgan Chase Bank, NA ^c	8,230	803	4,125	58,227	521	4,475	6,045	22,864	10,529	115,989	
Hilton Loan Servicing LP	1,053	577	1,069	13,454	273	157	1,211	1,502	884	21,760	
Ocwen Loan Servicing, LLC	387	308	377	2,474	303	52	301	1,698	530	6,290	
OneWest Bank	632	859	645	30,148	369	28	993	5,998	3,133	20,701	
Select Portfolio Servicing	1,428	520	1,485	5,657	414	258	631	2,098	2,551	15,743	
Wells Fargo Bank NA ^d	1,023	760	13,403	50,331	903	10,376	4,353	17,222	11,142	121,679	
TOTAL (These 10 Largest Servicers)	76,939	34,257	58,080	257,072	4,684	21,931	31,040	93,179	39,147	596,647	
	12.6%	2.4%	9.7%	43.2%	0.0%	3.6%	5.2%	15.6%	6.6%	100.0%	

Note: Data is as reported by servicers for actions completed through March 31, 2011. Survey data is not subject to the same data quality checks as data uploaded into the HAMP system of record.

*A loan that has been canceled, but no further action has yet been taken.

^aAn arrangement with the borrower and servicer that does not involve a formal loan modification.

^bBank of America, NA includes Bank of America, NA, DAC Home Loans Striving 1E, Home Loan Services and Wilshire Credit Corporation.

^cJPMorgan Chase Bank, NA includes EMC Mortgage Corporation.

^dWells Fargo Bank, NA includes all loans previously reported under WaMu Mortgage, FSB.

Note: Excludes loans still pending data transmission and loans otherwise removed from servicing portfolio.

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Disposition Path
Homeowners Not Accepted for HAMP Trial Modifications
Survey Data Through March 2011 (10 Largest Servicers)

Servicer	Homeowners Not Accepted for a HAMP Trial Modification Who Are In the Process of:										Total [As of March 2011]	
	Action Not Allowed -		Action Pending ¹		Action Bankruptcy Borrower ²		Alternative Payment		Short Sale/ Deed-in- Lieu			
	In Process	Current	In Process	Current	Borrower	Plan ³	Loan Payoff	Plan ³	Foreclosure Starts	Foreclosure Completion		
American Home Mortgage Servicing Inc.	1,319	758	6,136	24,488	680	725	3,337	5,126	830	41,399		
Bank of America, NA ⁴	37,259	6,819	59,960	66,672	1,460	3,777	29,513	54,097	19,718	289,713		
CIT Mortgage Inc.	22,016	8,079	23,181	27,441	5,504	13,085	3,859	7,759	5,787	114,711		
GMAC Mortgage, LLC	23,436	6,850	36,764	41,115	4,234	9,140	7,422	20,572	17,393	155,726		
JP Morgan Chase Bank NA ⁵	77,269	4,542	86,997	110,608	3,583	38,996	37,731	51,057	35,017	413,800		
U.S. Bancorp Loan Servicing LP	6,312	3,270	9,665	20,051	1,012	650	4,129	5,689	3,727	54,735		
Bowen Loan Servicing, LLC	8,000	1,972	16,551	32,056	7,260	1,547	5,222	16,362	6,156	97,126		
OneWest Bank	5,250	3,307	25,228	17,709	2,310	975	3,270	13,500	7,251	72,825		
Select Portfolio Servicing	2,405	331	2,676	3,497	371	417	444	1,638	1,095	12,874		
Wells Fargo Bank NA ⁶	14,320	4,229	44,540	56,702	1,910	33,053	12,030	17,768	13,941	178,509		
TOTAL (These 10 Largest Servicers)	197,626	39,937	325,794	402,339	26,334	76,365	82,995	194,637	85,455	1,431,422		
	13.8%	2.0%	22.0%	28.3%	1.0%	5.3%	5.0%	13.6%	6.0%	100.0%		

Note: Data is as reported by servicers for actions completed through March 31, 2011. Survey data is not subject to the same data quality checks as data uploaded into the HAMP system of record.

¹Homeowners who were not approved for a HAMP trial modification, but no further action has yet been taken.

²An arrangement with the borrower and servicer that does not involve a formal loan modification.

³Bank of America, NA includes Bank of America, NA, BEC Home Loan Servicing LP, Home Loan Services and Whitecap Credit Corporation.

⁴JPMorgan Chase Bank, NA includes GMAC Mortgage Corporation.

⁵Wells Fargo Bank, NA includes Wachovia Mortgage, FSB.

⁶Previously loans removed from servicing portfolios.

The most common causes of trials not accepted from all servicers are:

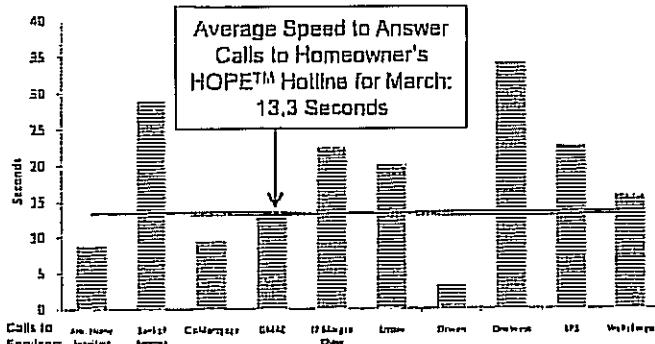
- Insufficient documentation
- Ineligible borrower: first lien housing expense is already below 31% of household income
- Ineligible mortgage

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Homeowner Experience (10 Largest Servicers)

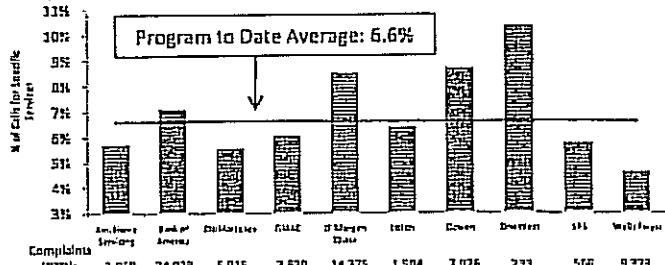
Average Speed to Answer Homeowner Calls (March)



Source: Survey data through March 31, 2011 from servicers on call volume to loss mitigation lines; Homeowner's HOPE™ Hotline.

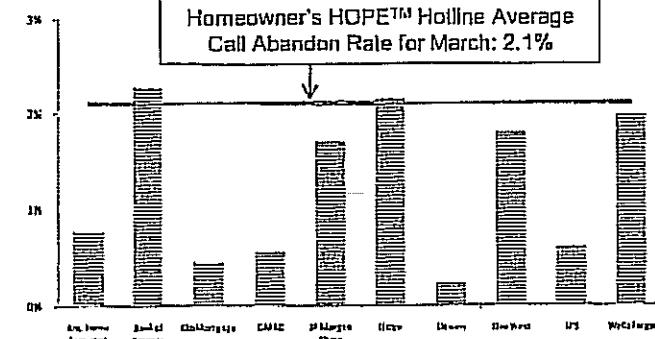
Service Complaint Rate to Homeowner's HOPE™ Hotline (Program to Date: Through April)

Program to date, there have been 1,084,223 calls to the Homeowner's HOPE™ Hotline regarding a specific SPA servicer, of which 6.6% included complaints. Below shows specific complaint rates.



Source: Homeowner's HOPE™ Hotline. Note: Complaint rate is the share of specific servicer's calls where the call was about a complaint (e.g., for calls about Chase, 10.4% include a complaint).

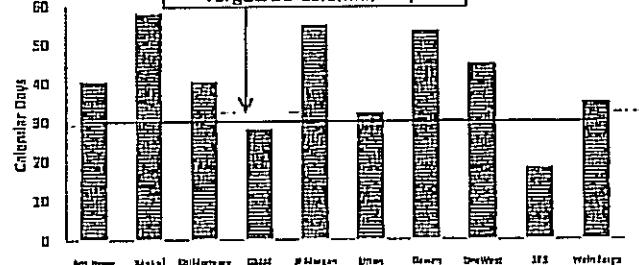
Call Abandon Rate (March)



Source: Survey data through March 31, 2011, from servicers on call volume to loss mitigation lines; Homeowner's HOPE™ Hotline.

Service Time to Resolve Third-Party Escalations (Program to Date: Through April)

Target: 30 Calendar Days



Received: 435 Cases (PTD)
Source: HAMP Solutions Center. Target of 30 calendar days, effective Feb. 1, 2011, includes an additional 5 days of processing by HAMP Solutions Center.

MAKING HOME AFFORDABLE

Making Home Affordable Service Results
Program Performance Report Through April 2011 Page 14 of 40

Modifications by Investor Type (Large Servicers)

Service	OS	PTD	Completed	Total
American Home Mortgage Servicing Inc.	1,298	23,590	3	24,892
Bank of America, NA ¹	91,283	55,510	8,843	155,636
CitiMortgage, Inc.	30,019	4,517	16,740	51,270
GMAC Mortgage, LLC	23,800	6,042	11,250	41,092
JP Morgan Chase NA ²	48,123	38,571	18,273	104,970
Lilac Loan Servicing LP	87	11,404	11	11,502
Ocwen Loan Servicing, LLC	7,145	23,036	136	31,116
OneWest Bank	13,279	12,423	2,133	27,835
Select Portfolio Servicing	510	10,750	2,515	19,775
Wells Fargo Bank, NA ³	48,380	14,029	36,642	99,051
Other HAMP Servicers	130,388	32,842	14,086	177,416
Total	394,307	239,616	110,632	744,555

¹Bank of America, NA includes Bank of America, NA, DAC Home Loans Servicing LP, Home Loan Services and WaMu Credit Corporation.

²J.P. Morgan Chase Bank, NA includes EMC Mortgage Corporation.

³Wells Fargo Bank, NA includes all loans previously reported under WaMu Mortgage, FSB.

Note: Figures reflect active trials and active permanent modifications.

MHA Servicer Assessment Report 69-9 Filed 08/08/11 Page 15 of 40

[Overview](#)

Background

Since the Making Home Affordable Program's (MHA) inception in the spring of 2009, Treasury has monitored the performance of participating mortgage servicers. Treasury has been publicly reporting information about servicer performance through two types of data: compliance data, which reflects servicer compliance with specific MHA guidelines; and program results data, which reflects how timely and effectively servicers assist eligible homeowners and report program activity.

When MHA began, most servicers did not have the staff, procedures, or systems in place to respond to the volume of homeowners struggling to pay their mortgages, or to respond to the housing crisis generally. Very few mortgage modifications were even occurring. Treasury sought to get servicers to join MHA and to improve their operations quickly, so as to implement a national mortgage modification program.

Through ongoing compliance reviews, Treasury has required participating servicers to take specific actions to improve their servicing processes. While the servicers have improved their performance, they still have more progress to make. Toward that end, Treasury is publishing servicer assessments for each of the 10 largest servicers participating in MHA. Not only will the assessments provide more transparency to the public about servicer performance in the program, but the assessments are also intended to encourage servicers to correct identified instances of non-compliance.

Servicer participation in MHA is voluntary, based on a contract with Treasury. Although Treasury does not regulate these institutions and does not have the authority to impose fines or penalties, Treasury can, pursuant to the contract, take certain remedial actions against servicers not in compliance with MHA guidelines. Such remedial actions include requiring servicers to correct identified instances of non-compliance, as noted above. In addition, Treasury can implement financial remedies such as withholding incentive payments owed to servicers. Such incentive payments, which are the only payments Treasury makes for the benefit of servicers under the program, include payments for every successful permanent modification under the

Home Affordable Modification Program, and payments for completed short sale/deed-in-lieu pursuant to the Home Affordable Foreclosure Alternative Program.

It is important to note that Treasury's compliance work related to MHA applies only to those servicers that have agreed to participate in MHA for mortgage loans that are not owned or guaranteed by Fannie Mae or Freddie Mac (Government Sponsored Enterprises, or GSEs). Treasury cannot and does not perform compliance reviews of (1) mortgage loans or activities that fall outside of MHA, (2) GSE loans or (3) those loans insured through the Federal Housing Administration. For each servicer, the loans that are eligible for MHA represent only a portion of that servicer's overall mortgage servicing operation.

Treasury's foremost goal is to assist struggling homeowners who may be eligible for MHA. These servicer assessments set a new benchmark for providing detailed information about how mortgage servicers are performing against key metrics. But, in addition to this direct effect, MHA has had an important indirect effect on the market as well. MHA has established standards that have improved mortgage modifications across the industry, and has led to important changes in the way mortgage servicers assist struggling homeowners generally. These changes include standards for how mortgage modifications should be designed so that they are sustainable, standards for communications with homeowners so that the process is as efficient and as understandable as possible, and a variety of standards for protecting homeowners, such as prohibitions on "dual tracking" — simultaneously evaluating a homeowner for a modification while proceeding to foreclose. Going forward, Treasury hopes these assessments will also set the standard for transparency about mortgage servicer efforts to assist homeowners.

Below are general descriptions of the data, the evaluation process, and the consequences for servicers needing improvement.

(Continued on next page)

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Overview

The Performance Data: Compliance and Program Results

Freddie Mac, acting as Treasury's compliance agent for MHA, has created a separate division known as Making Home Affordable-Compliance (MHA-C) to evaluate servicer performance through audits of program compliance. MHA-C tests and evaluates a range of servicer activities for compliance with MHA guidelines. Once MHA-C's reviews are complete, MHA-C shares its results with the servicers and identifies areas that need remediation. Each compliance activity tested falls into one of three overall compliance categories – Identifying and Contacting Homeowners, Homeowner Evaluation and Assistance, and Program Management, Reporting and Governance. The compliance results shared with the servicers are then used to generate the servicer assessments.

The assessments highlight particular compliance activities tested by MHA-C that had significant impact on homeowners and include for those highlighted activities a one-star, two-star, or three-star rating for the most recent evaluations. One star means the servicer did not meet Treasury's benchmark required for that particular activity, and the servicer needs substantial improvement in its performance of that activity. Two stars mean the servicer did not meet Treasury's benchmark required for that particular activity, and the servicer needs moderate improvement in its performance of that activity. Three stars mean the servicer met Treasury's benchmark required for that particular activity, but the servicer may nonetheless need minor improvement in its performance of that activity.

Although the compliance reviews emphasize objective measurements and observed facts, compliance reviews still involve a certain level of judgment. Compliance reviews are also retrospective in nature – looking backward, not forward, which means that activities identified as needing improvement in a given quarter may already be under remediation by the servicer. In addition, not every compliance activity is evaluated every quarter, which means that a rating from one quarter might carry forward to the subsequent quarter's assessment if that activity was not retested in that subsequent quarter.

Finally, the compliance reviews use "sampling" as a testing methodology. Sampling, an industry-accepted auditing technique, looks at a subset of a particular population of activity transactions, rather than the entirety of the population of activity transactions, to extrapolate a servicer's overall performance in that particular activity.

In addition to the ratings for compliance data, the assessments also include

program results metrics. Fannie Mae, acting as Treasury's program administrator for MHA, collects servicer data used to measure program results. These metrics are key indicators of how timely and effectively servicers assist eligible homeowners under MHA guidelines and report program data. Although the servicers are not given an overall rating for this data, the results metrics nonetheless compare a servicer's performance for a given quarter against the "best" and "worst" performing servicer of the 30 largest servicers participating in the program. The results metrics provide a snapshot of how each of those servicers compares in specific areas under MHA.

The Determination Process: Results of the Data

Treasury reviews the compliance data and ratings, the program results metrics, and other relevant factors affecting servicer performance in determining whether a servicer needs substantial improvement, moderate improvement, or minor improvement to its performance under MHA guidelines. The assessments summarize the significant factors impacting those decisions. Based on those assessments, Treasury takes remedial action against servicers. Page 16 summarizes the overall level of improvement needed for each servicer.

Consequences for Servicers

For servicers in need of substantial improvement, Treasury will, absent extenuating circumstances, withhold financial incentives owed to those servicers until they make certain identified improvements. In certain cases, particularly where there is a failure to correct identified problems within a reasonable time, Treasury may also permanently reduce the financial incentives. Servicers in need of moderate improvement will be subject to withholding in the future if they fail to make certain identified improvements. All withholdings apply only to incentives owed to servicers for their participation in MHA; these withholdings do not apply to incentives paid to servicers for the benefit of homeowners or investors.

Additional Information

See the "Metrics Description" on page 37 for a description of each of the compliance and results metrics presented in the assessments. For more information on the assessments, please visit: www.FinancialStability.gov.

MHA Servicer Assessment Report 69-9 . Filed 08/08/11 . Page 17 of 40
Overview

Servicer Assessment Results

The following table details the results of the Servicer Assessments, based on compliance and program results:

Improvement Needed	Servicer Name
Substantial	Bank of America, NA J.P. Morgan Chase Bank, NA Ocwen Loan Servicing, LLC Wells Fargo Bank, NA
Moderate	American Home Mortgage Servicing, Inc. CitiMortgage, Inc. GMAC Mortgage, LLC Litton Loan Servicing LP OneWest Bank Select Portfolio Servicing

Beginning this month, Treasury will withhold servicer incentives owed to three of the four servicers requiring substantial improvement until those servicers make certain identified improvements.¹

For those servicers requiring moderate improvement, Treasury is not withholding servicer incentives for this quarter. However, those servicers that fail to improve those areas identified will be subject to servicer incentive withholding in the future.

No servicer has been identified as needing only minor improvement for this quarter.

Please refer to the following MHA Servicer Assessment pages for further detail on the First Quarter 2011 servicer assessment results.

¹Treasury will not withhold servicer incentives owed to Ocwen Loan Servicing, LLC for this quarter. Because Ocwen's compliance results for the first quarter 2011 were substantially and negatively affected by its acquisition of a large servicing portfolio during the compliance testing period, Treasury determined that withholding servicer incentives was not warranted for this quarter. Treasury will withhold servicer incentives from Ocwen if future compliance results do not indicate improvements.

MIIA Servicer Assessment American Home Mortgage Servicing Inc.

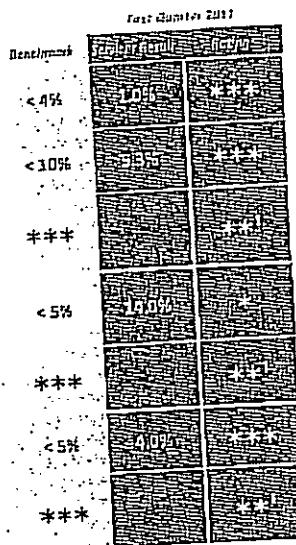
Compliance Results

Overview

- These tables reflect the results of compliance reviews of the servicer's adherence to MIIA program requirements.
- Quantitative results reflect percentages of tests that did not have a detailed outcome.
- Qualitative results reflect percentages of tests that did not have a detailed outcome.
- Scores are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

Performance Category
Identifying and Controlling Homeowners
 Assesses whether the servicer identifies and communicates appropriately with potentially eligible MIIA homeowners.

- Metrics**
- Second Look & Dispute Percentage items reviewed where MIIA could not agree with the servicer's initial determination
 - Second Look & Unable to Determine Percentage items reviewed where MIIA was not able to conclude on the servicer's MIIA determination
 - Internal Controls for Identifying and Controlling Homeowners Metrics assess whether servicer business processes are conducted effectively and in accordance with MIIA guidelines
 - Income Calculation Error % Percentage items for which income calculation differs from the amount determined by servicer
 - Internal Controls for Homeowner Evaluation and Assistance Metrics assess whether servicer business processes are conducted effectively and in accordance with MIIA guidelines
 - Incentive Payment Data Errors Assessment of differences in total paid to servicer resulting from data discrepancies between servicer files and the benchmark files
 - Incentive Controls for Program Management, Reporting, and Governance Metrics assess whether servicer business processes are conducted effectively and in accordance with MIIA guidelines



J = Rating carried forward from prior quarter

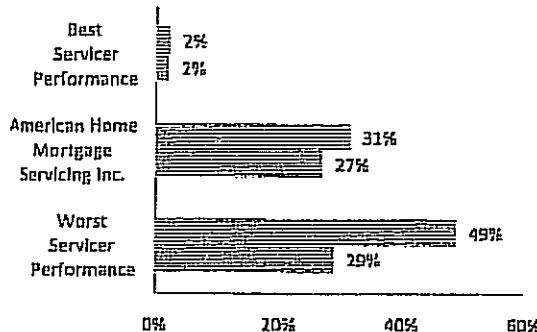
Rating Legend	
	Met benchmark; minor improvement may be indicated
	Did not meet benchmark; moderate improvement needed
	Did not meet benchmark; substantial improvement needed

Result

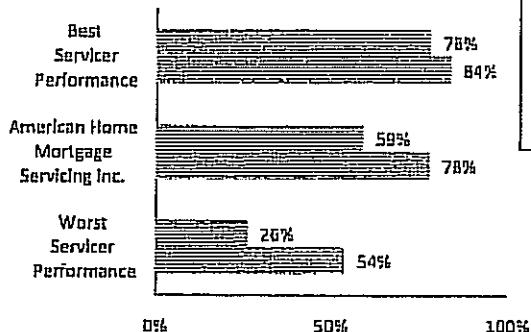
- American Home Mortgage Servicing Inc. has areas requiring moderate improvement.
- After considering all relevant factors, American Home Mortgage Servicing Inc. servicer incentives will not be withheld at this time.
- Withholding may commence next quarter if American Home Mortgage Servicing Inc. fails to demonstrate improvement in the next assessment.

NHA Servicer Assessment American Home Mortgage Servicing Inc.
Program Results

**Aged Trials as a Percentage
of Active Trials**

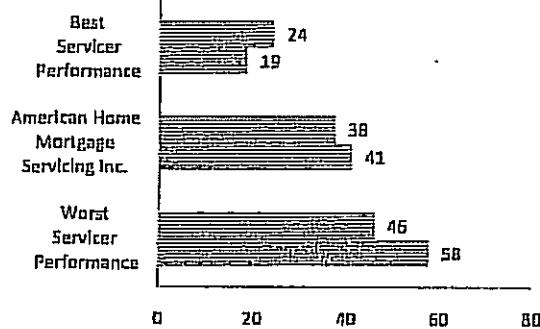


**Conversion Rate for Trials Started
On or After 6/1/2010**

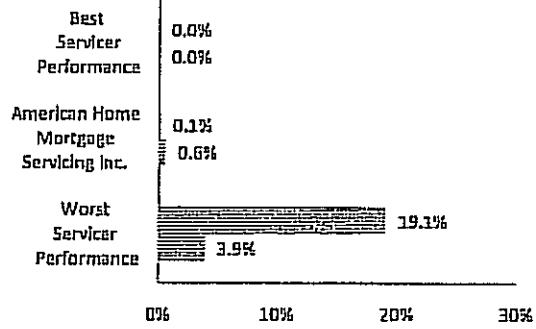


Results as of:
 Dec. 2010
 March 2011

**Average Calendar Days to Resolve
Escalated Cases**



Missing Modification Status Reports (%)



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MIIA Servicer Assessment: Bank of America, NA 20 of 40
Compliance Results

Overview

- These metrics reflect the results of compliance reviews of the servicer's adherence to MIIA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

		First Quarter 2011	
		MIIA	Bank of America, NA
Performance Category			
Identifying and Contacting Homeowners			
Assesses whether the servicer identifies and communicates appropriately with potentially eligible MIIA homeowners.			
Alarms			
Second Look % Disagree	Benchmark		
Percent of loans reviewed where the servicer did not agree with the servicer's MIIA determination	< 4%		
Second Look % Unable to Determine	Benchmark		
Percent of loans reviewed where MIIA was not able to conclude on the servicer's MIIA determination	< 10%		
Internal Controls for Identifying and Contacting Homeowners	Benchmark		
MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines	***		
Income Calculation Error %	Benchmark		
Percent of loans for which MIIA-C income calculation differs from the servicer by more than 5%	< 5%		
Internal Controls for Homeowner Evaluation and Assistance	Benchmark		
MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines	***		
Incorrect Payment Data Errors	Benchmark		
Percent of payment data errors in submitted loans involving loan data discrepancies between servicer files and the MIIA system record	< 5%		
Internal Controls for Program Management, Reporting, and Governance	Benchmark		
MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines	***		

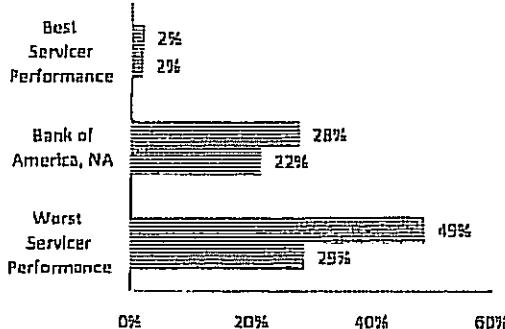
1 - Rating carried forward from prior quarter

Rating Legend	
Met benchmark; minor improvement may be indicated	
Did not meet benchmark; moderate improvement needed	
Did not meet benchmark; substantial improvement needed	

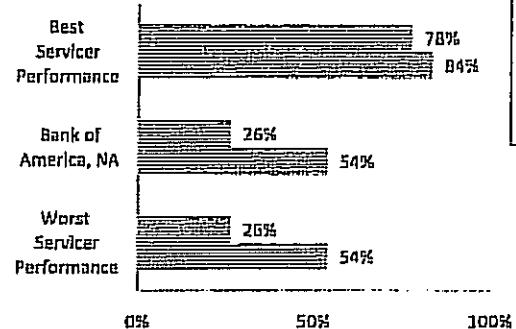
RESULT	
<ul style="list-style-type: none"> • Bank of America, NA has areas requiring substantial improvement. 	
<ul style="list-style-type: none"> • After considering all relevant factors, Bank of America, NA servicer incentives will be withheld at this time. 	
<ul style="list-style-type: none"> • Permanent reductions of incentives may commence in subsequent quarters if Bank of America, NA fails to demonstrate improvement. 	

MHA Servicer Assessment: Bank of America, NA
Program Results

Aged Trials as a Percentage of Active Trials



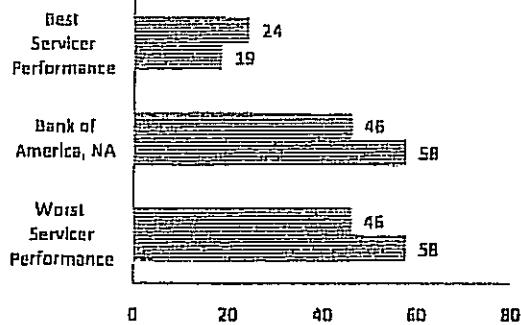
Conversion Rate for Trials Started On or After 6/1/2010



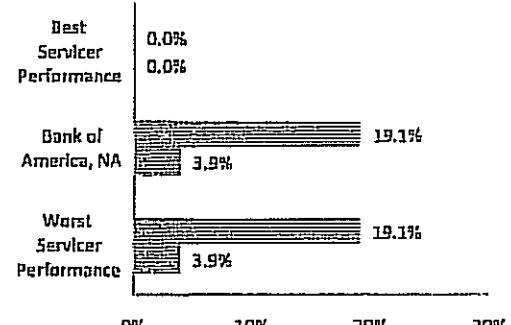
Results as of:

Dec. 2010
 March 2011

Average Calendar Days to Resolve Escalated Cases



Missing Modification Status Reports (%)



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MIIA Servicer Assessment Citimortgage, Inc. Page 22 of 40
Compliance Results

Overview

- These metrics reflect the results of compliance reviews of the servicer's adherence to MIIA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each individual result.

Performance Category	
	Identifying and Contacting Homeowners Assesses whether the servicer identifies and communicates appropriately with potentially eligible MIIA homeowners.
	Homeowner Evaluation and Assistance Assesses whether servicer correctly evaluates homeowner's eligibility for MIIA programs, communicates decision in a timely manner, and accurately executes appropriate MIIA activities.
	Program Management, Reporting, and Governance Assesses whether the servicer has effective program management, governance processes, and timely and correct submission of program reports and program information.

Metric	
	Second Look & Disagree Percentage of loans reviewed where MIIA-C did not agree with the system's MIIA determination
	Second Look & Unable to Determine Percentage of loans reviewed where MIIA-C was not able to conclude on the servicer's MIIA determination
	Internal Controls for Identifying and Contacting Homeowners MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines
	Income Calculation Error % Percentage of loans for which MIIA-C income calculation differs from the servicer's by more than 5%
	Internal Controls for Homeowner Evaluation and Assistance MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines
	Incentive Payment Data Errors Percentage of different calculated incentive amounts from data corresponding between servicer file and the MIIA system record
	Internal Controls for Program Management, Reporting, and Governance MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines

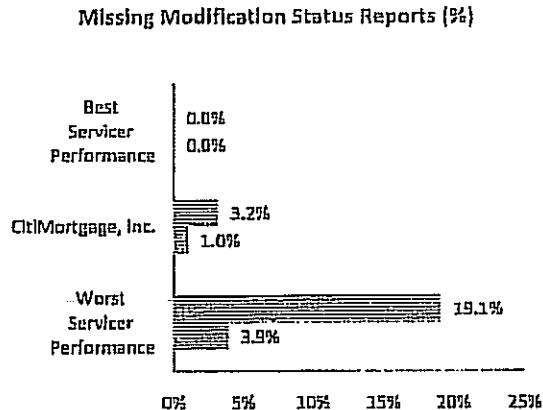
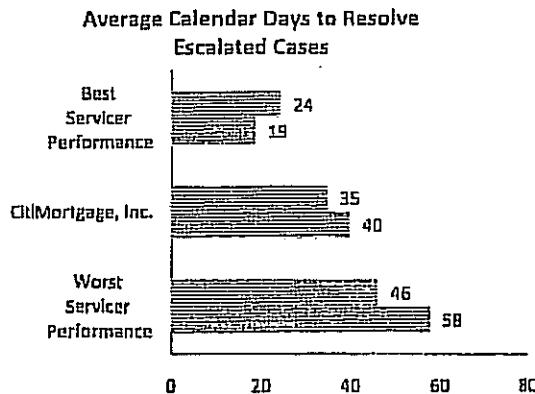
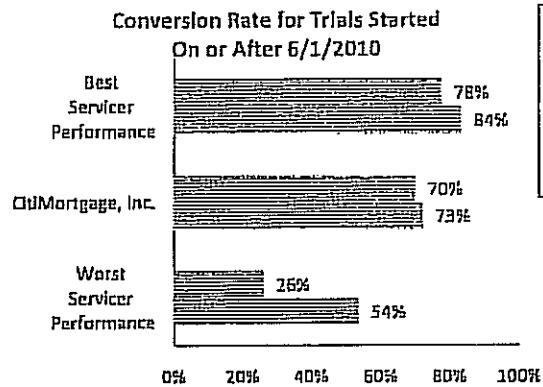
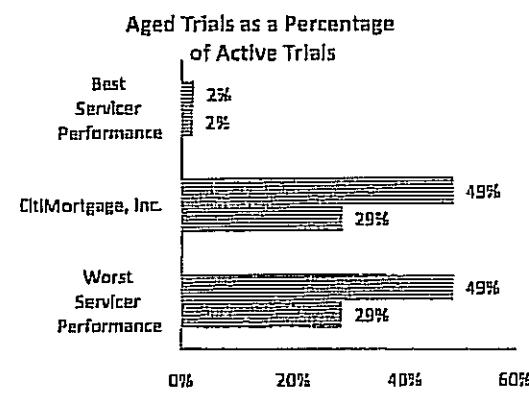
Risk Category FQ11		
Benchmark	Current Result	Railroad
< 4%	2.1%	2.1%
< 10%	12.1%	12.1%
***	10.0%	10.0%
< 5%	10.0%	10.0%
***	10.0%	10.0%
< 5%	10.0%	10.0%
***	10.0%	10.0%

Rating Legend	
	Met benchmark; minor improvement may be indicated
	Did not meet benchmark; moderate improvement needed
	Did not meet benchmark; substantial improvement needed

Result	
	+ Citimortgage, Inc. has areas requiring moderate improvement.
	+ After considering all relevant factors, Citimortgage, Inc. servicer incentives will not be withheld at this time.
	+ Withholding may commence next quarter if Citimortgage, Inc. fails to demonstrate improvement in the next assessment.

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FEDERAL
Housing Finance Agency

MHA Services Assessment for CitiMortgage, Inc. Page 23 of 40
Program Results



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

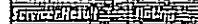
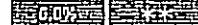
MAKING HOME AFFORDABLE

MIA Services Assessment for GMAC Mortgage, page 24 of 40

Compliance Results

Overview

- These metrics reflect the results of compliance reviews of the servicer's adherence to MIA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

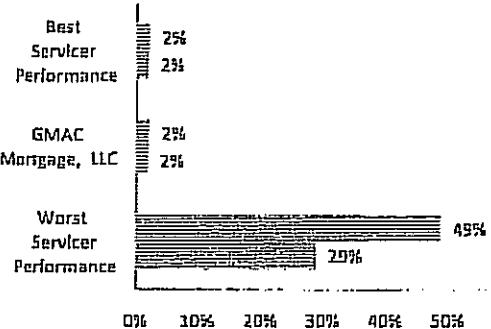
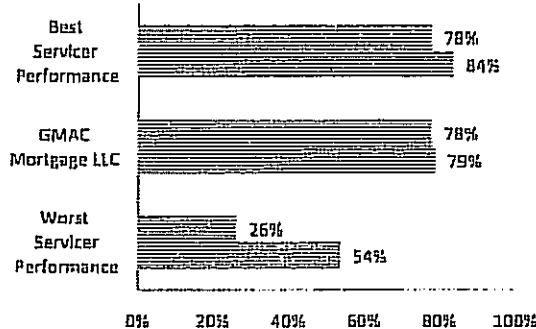
Performance Category		Metric	Benchmark	First Quarter 2011
①	Identifying and Contacting Homeowners Assesses whether servicer identifies and communicates appropriately with potentially eligible MIA homeowners.	■ Second Look Still Disagrees Percentage of loans reviewed where GMAC did not agree with the servicer's MIA determinations	< 4%	 
②	Homeowner Evaluation and Assistance Assesses whether servicer correctly evaluates homeowner's eligibility for MIA programs, communicates decisions in a timely manner, and accurately executes appropriate MIA activities.	■ Second Look Still Unable to Determine Percentage of loans reviewed where GMAC was not able to conclude on the servicer's MIA determinations	< 10%	 
③	Program Management, Reporting, and Governance Assesses whether the servicer has effective program management, governance processes, and timely and correct submission of program reports and program information.	■ Internal Controls for Identifying and Contacting Homeowners MIA-Crosses whether servicer business processes are conducted effectively and in accordance with MIA guidelines	***	 
		■ Income Calculation Error X Percentage of loans for which GMAC's income calculation differs from the servicer's by more than 5%	< 5%	 
		■ Internal Controls for Homeowner Evaluation and Assistance MIA-Crosses whether servicer business processes are conducted effectively and in accordance with MIA guidelines	***	 
		■ Internal Payment Data Errors Annual percentage of 15% or more calculated differences resulting from data discrepancies between servicer files and the MIA system of record	< 5%	 
		■ Internal Controls for Program Management, Reporting, and Governance MIA-Crosses whether servicer business processes are conducted effectively and in accordance with MIA guidelines	***	 

1 - Rating carried forward from prior quarter

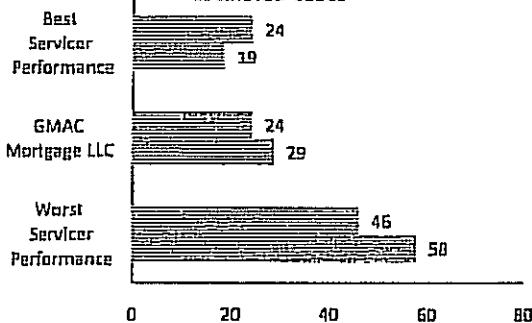
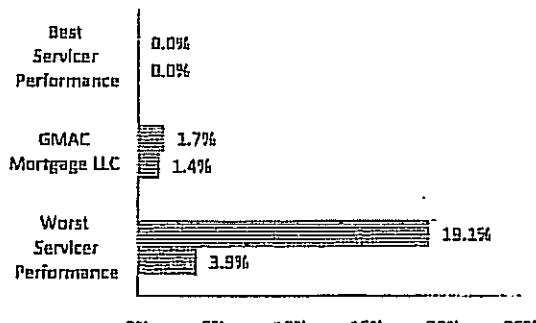
Rating Legend	
	Met benchmark; minor improvement may be indicated
	Did not meet benchmark; moderate improvement needed
	Did not meet benchmark; substantial improvement needed

Result	
	<ul style="list-style-type: none"> • GMAC Mortgage, LLC has areas requiring moderate improvement. • After considering all relevant factors, GMAC Mortgage, LLC servicer incentives will not be withheld at this time. • Withholding may commence next quarter if GMAC Mortgage, LLC fails to demonstrate improvement in the next assessment.

MHA Servicer Assessment GMAC Mortgage, page 25 of 40
Program Results

Aged Trials as a Percentage of Active Trials**Conversion Rate for Trials Started On or After 6/1/2010****Results as of:**

Dec. 2010
 Dec. 2010
 March 2011

Average Calendar Days to Resolve Escalated Cases**Missing Modification Status Reports (%)**

Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MHA Servicer Assessment Report - Morgan Chase Bank, NA

Compliance Results

Overview

- These metrics reflect the results of compliance reviews of the servicer's adherence to MHA Program requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

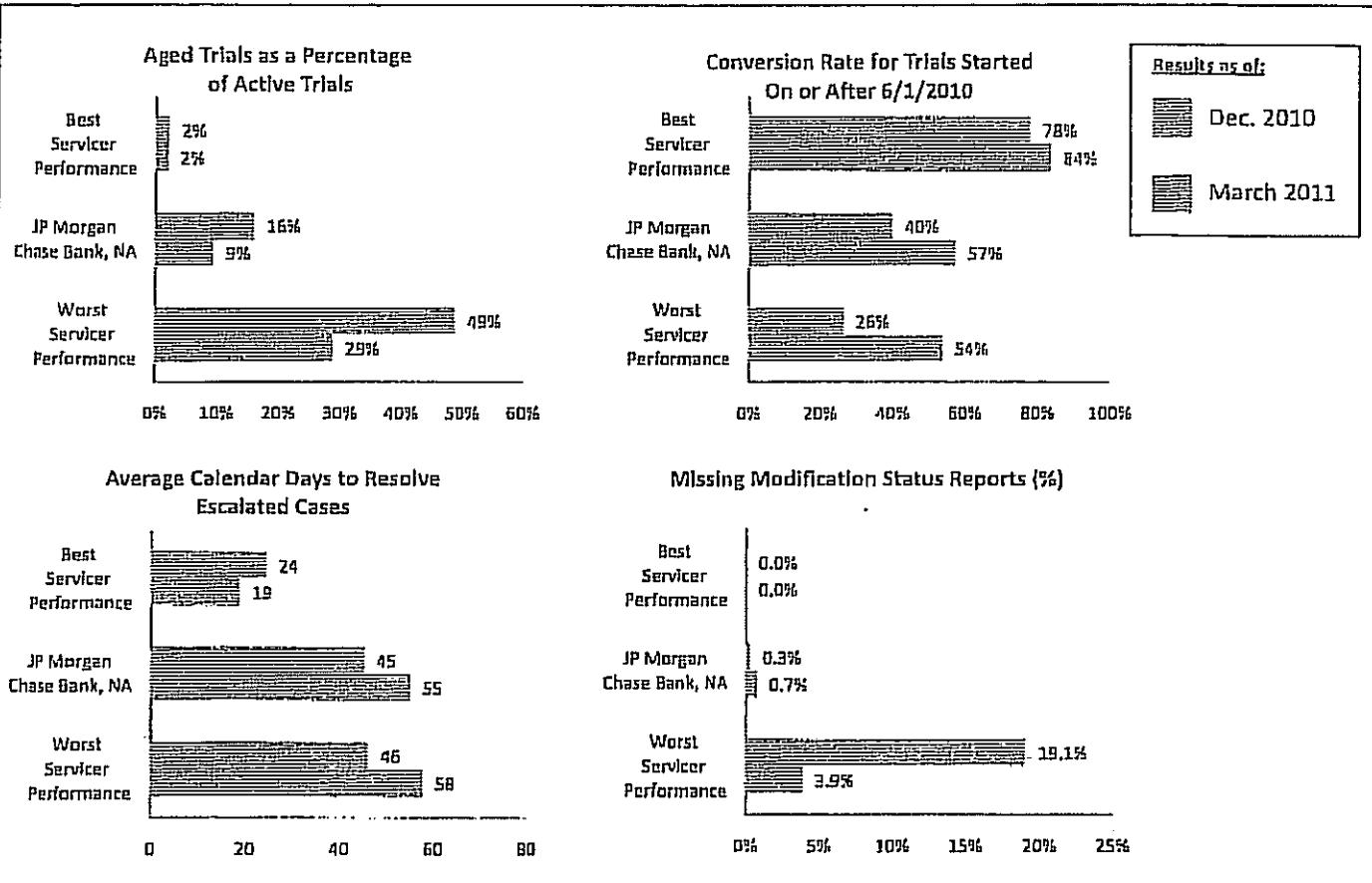
Performance Category	Metric	Benchmark	First Quarter 2012	
			Met	Did Not Meet
 Identifying and Contacting Homeowners	▪ Second Loan Not Disagreed Percentage of loans reviewed where MHA-C did not agree with the servicer's MHA determination	< 4%		
	▪ Second Loan Not Usable to Determine Percentage of loans reviewed where MHA-C was unable to conclude on the servicer's MHA determination	< 10%		
	▪ Internal Controls for Identifying and Contacting Homeowners MHA-C assesses whether servicer business practices are conducted effectively and in accordance with MHA guidelines	* * *		
 Homeowner Evaluation and Assistance	▪ Income Calculation Error S Percentage of loans for which MHA-C's income calculations differ from the servicer's by more than \$K	< 5%		
	▪ Internal Controls for Homeowner Evaluation and Assistance MHA-C assesses whether servicer business practices are conducted effectively and in accordance with MHA guidelines	* * *		
 Program Management, Reporting, and Governance	▪ Incentive Payment Data Errors Average percentage of differences in calculated Incentives resulting from data discrepancies between service files and the MHA system at least once per quarter	< 5%		
	▪ Internal Controls for Program Management, Reporting, and Governance MHA-C assesses whether servicer business practices are conducted effectively and in accordance with MHA guidelines	* * *		

J = Rating started forward from prior quarter

Rating Legend	
	Met benchmark; minor improvement may be indicated
	Did not meet benchmark; moderate improvement needed
	Did not meet benchmark; substantial improvement needed

Result
• J.P. Morgan Chase Bank, NA has areas requiring substantial improvement.
• After considering all relevant factors, J.P. Morgan Chase Bank, NA servicer Incentives will be withheld at this time.
• Permanent reductions of Incentives may commence in subsequent quarters if J.P. Morgan Chase Bank, NA fails to demonstrate improvement.

HFA Services Assessment - JP Morgan Chase Bank, NA
Program Results



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MIIA Servicer Assessment Information End of Servicing 28 of 40 Compliance Results

Overview

- These metrics reflect the results of compliance reviews of the servicer's adherence to MIIA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

Performance Category		Benchmark		First Quarter 2011	
				Performance	Improvement
 Identifying and Contracting Homeowners	Assesses whether the servicer identifies and communicates appropriately with potentially eligible MIIA homeowners.	<ul style="list-style-type: none"> - Eligible - Second Look & Eligible Percentage of loans reviewed where MIIA-C did not agree with the servicer's MIIA determination 	< 4%	 	 
 Homeowner Evaluation and Assistance	Assesses whether servicer correctly evaluates homeowners' eligibility for MIIA programs, communicates decisions in a timely manner, and adequately executes appropriate MIIA activities.	<ul style="list-style-type: none"> - Internal Controls for Identifying and Contracting Homeowners MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines - Income Calculation Error % Estimated averages for which MIIA-C income calculation differs from the servicer's by percentage 	< 10% < 5%	   	 
 Program Management, Reporting, and Governance	Assesses whether the servicer has effective program management, governance processes, and timely and timely submission of program reports and program information.	<ul style="list-style-type: none"> - Internal Controls for Homeowner Evaluation and Assistance MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines - Incentive Payment Delinquent Average percentage of difference in calculated incentive resulting from data differences between servicer files and the MIIA system or other - Internal Controls for Program Management, Reporting, and Governance MIIA-C assesses whether servicer business processes are conducted effectively and in accordance with MIIA guidelines 	< 5% < 5%	   	 

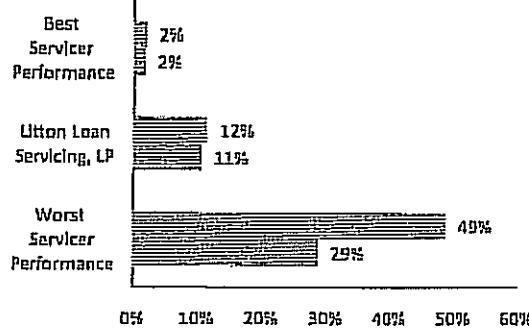
J - Rating carried forward from prior quarter

Rating Legend
Met benchmark; minor improvement may be indicated
Did not meet benchmark; moderate improvement needed
Did not meet benchmark; substantial improvement needed

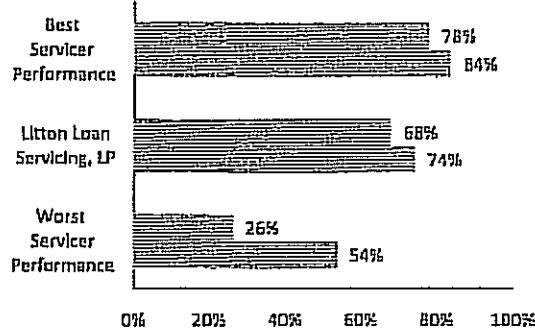
Result
+ Utton Loan Servicing LP has areas requiring moderate improvement.
+ After considering all relevant factors, Utton Loan Servicing LP servicer incentives will not be withheld at this time.
+ Withholding may commence next quarter if Utton Loan Servicing LP fails to demonstrate improvement in the next assessment.

MHA Servicer Assessment Litton Loan Servicing, LP of 40
Program Results

Aged Trials as a Percentage of Active Trials

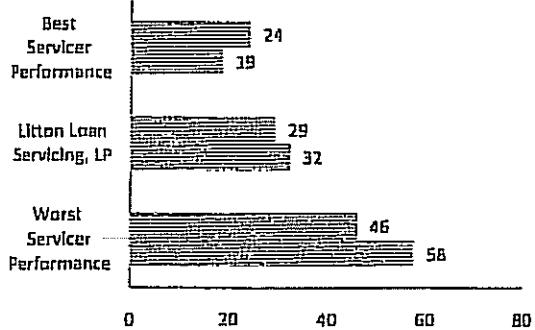


Conversion Rate for Trials Started On or After 6/1/2010

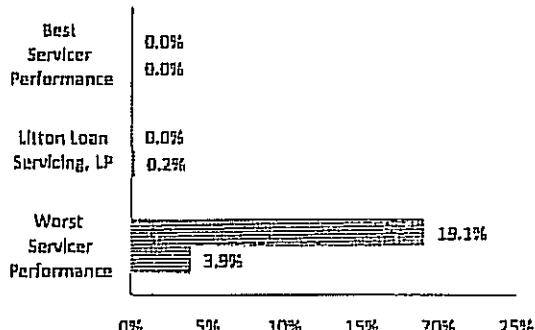


Results as of:
 Dec. 2010
 March 2011

Average Calendar Days to Resolve Escalated Cases



Missing Modification Status Reports (%)



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MIA Servicer Assessment for Ocwen Loan Servicing LLC
Compliance Results

OVERVIEW

- These metrics reflect the results of compliance reviews of the servicer's adherence to MIA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

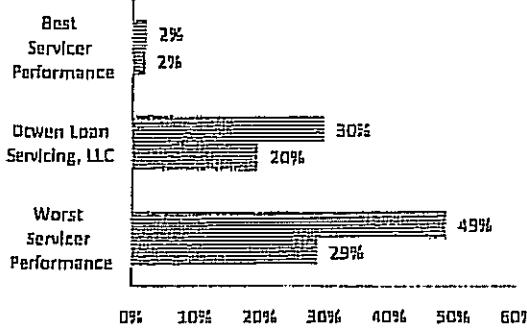
Performance Category	Metric	Benchmark	First Quarter 2011	
			Service	Control
Identifying and Contracting Homeowners <small>Assesses whether the servicer identifies and communicates appropriately with potentially eligible MIA homeowners.</small>	<ul style="list-style-type: none"> Second Look % Disagree: Percentage of loans reviewed where MIA Calculation differs with the servicer's initial determination. 	< 4%	100%	100%
	<ul style="list-style-type: none"> Second Look % Unable to Determine: Percentage of loans reviewed where MIA-C was not able to conclude on the servicer's initial determination. 	< 10%	100%	100%
	<ul style="list-style-type: none"> Internal Controls for Identifying and Contracting Homeowners: All cases in which servicer bulletins procedures are conducted effectively and in accordance with MIA guidelines. 	***	100%	100%
Homeowner Evaluation and Assistance <small>Assesses whether the servicer correctly evaluates homeowners' eligibility for MIA programs, communicates decisions in a timely manner, and adequately executes appropriate MIA activities.</small>	<ul style="list-style-type: none"> Income Calculation Error %: Percentage of loans for which MIA-C income calculation differs from the servicer's by more than 3%. 	< 5%	100%	100%
	<ul style="list-style-type: none"> Internal Controls for Homeowner Evaluation and Assistance: All cases in which servicer bulletins procedures are conducted effectively and in accordance with MIA guidelines. 	***	100%	100%
Program Management, Reporting, and Governance <small>Assesses whether the servicer has effective program management, governance processes, and timely and correct submission of program reports and program information.</small>	<ul style="list-style-type: none"> Incentive Payment Data Errors: Average percentage of differences in calculated incentives resulting from data discrepancies between servicer file and the MIA optional form. 	< 5%	100%	100%
	<ul style="list-style-type: none"> Internal Controls for Program Management, Reporting, and Governance: All cases in which servicer bulletins procedures are conducted effectively and in accordance with MIA guidelines. 	***	100%	100%

Rating Legend	
 	Met benchmark; minor improvement may be initiated.
 	Did not meet benchmark; moderate improvement needed.
 	Did not meet benchmark; substantial improvement needed.

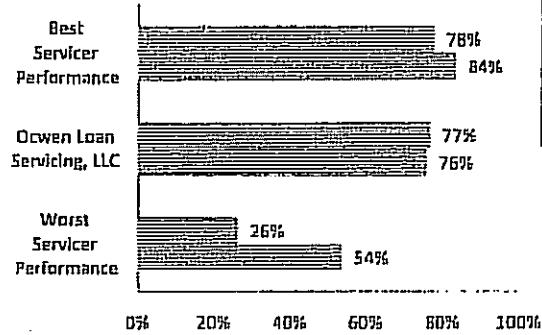
Result	
	<ul style="list-style-type: none"> Ocwen Loan Servicing, LLC has areas requiring substantial improvement. After considering all relevant factors, including the acquisition of a large servicing portfolio during the compliance testing period, Ocwen Loan Servicing, LLC servicer incentives will not be withheld at this time. Treasury will withhold servicer incentives from Ocwen Loan Servicing, LLC if future compliance results do not indicate improvement.

MHA Servicer Assessment Program Results

Aged Trials as a Percentage of Active Trials



Conversion Rate for Trials Started On or After 6/1/2010

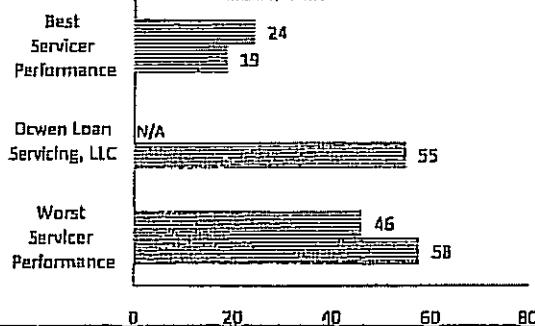


Results as of:

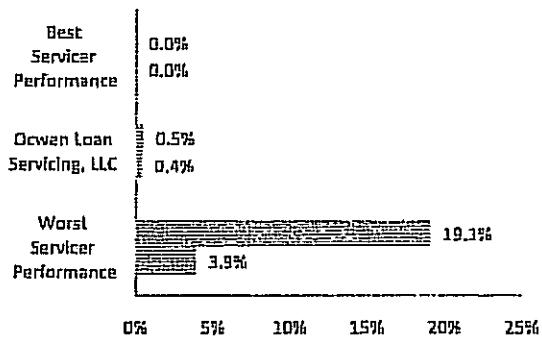
- Dec. 2010
- March 2011

Average Calendar Days to Resolve Escalated Cases

Note: December 2010 data is unavailable for this servicer.



Missing Modification Status Reports (%)



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MHA Services Assessment Interim OneWest Bank 1 - Page 32 of 40

Compliance Results

Overview

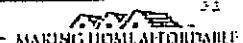
- These metrics reflect the results of compliance reviews of the servicer's adherence to MHA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

Performance Category	Metric	Benchmark	First Quarter 2011			
			Q1	Q2	Q3	Q4
	Identifying and Contacting Homeowners Assesses whether the servicer identifies and communicates appropriately with potentially eligible MHA homeowners.	<ul style="list-style-type: none"> ■ Second Look & Disagree: Performance is measured where the servicer did not agree with the review's MHA determination. ■ Second Look & Unable to Determine: Performance is measured where the servicer was unable to verify on the servicer's MHA determination. ■ Internal Controls for Identifying and Contacting Homeowners: MHA assesses whether servicer business processes are conducted effectively and in accordance with MHA guidelines. 	< 6%			
	Homeowner Evaluation and Assistance Assesses whether servicer correctly evaluates homeowner's eligibility for MHA programs, communicates decisions in a timely manner, and accurately executes appropriate MHA activities.	<ul style="list-style-type: none"> ■ Income Calculation Error %: MHA performs level 1b MHA-C income calculations either from the servicer's by more than 5%. ■ Internal Controls for Homeowner Evaluation and Assistance: MHA assesses whether servicer business processes are conducted effectively and in accordance with MHA guidelines. ■ Intensive Payment Data Errors: Average percentage of different incomplete transactions involving home data documents by servicer Q1 and the MHA system record. ■ Internal Controls for Program Management, Recording, and Governance: MHA assesses whether servicer business processes are conducted effectively and in accordance with MHA guidelines. 	< 5%			
	Program Management, Reporting, and Governance Assesses whether the servicer has effective program management, governance processes, and timely and correct submission of program reports and program information.	<ul style="list-style-type: none"> ■ Internal Controls for Program Management, Recording, and Governance: MHA assesses whether servicer business processes are conducted effectively and in accordance with MHA guidelines. 	< 5%			

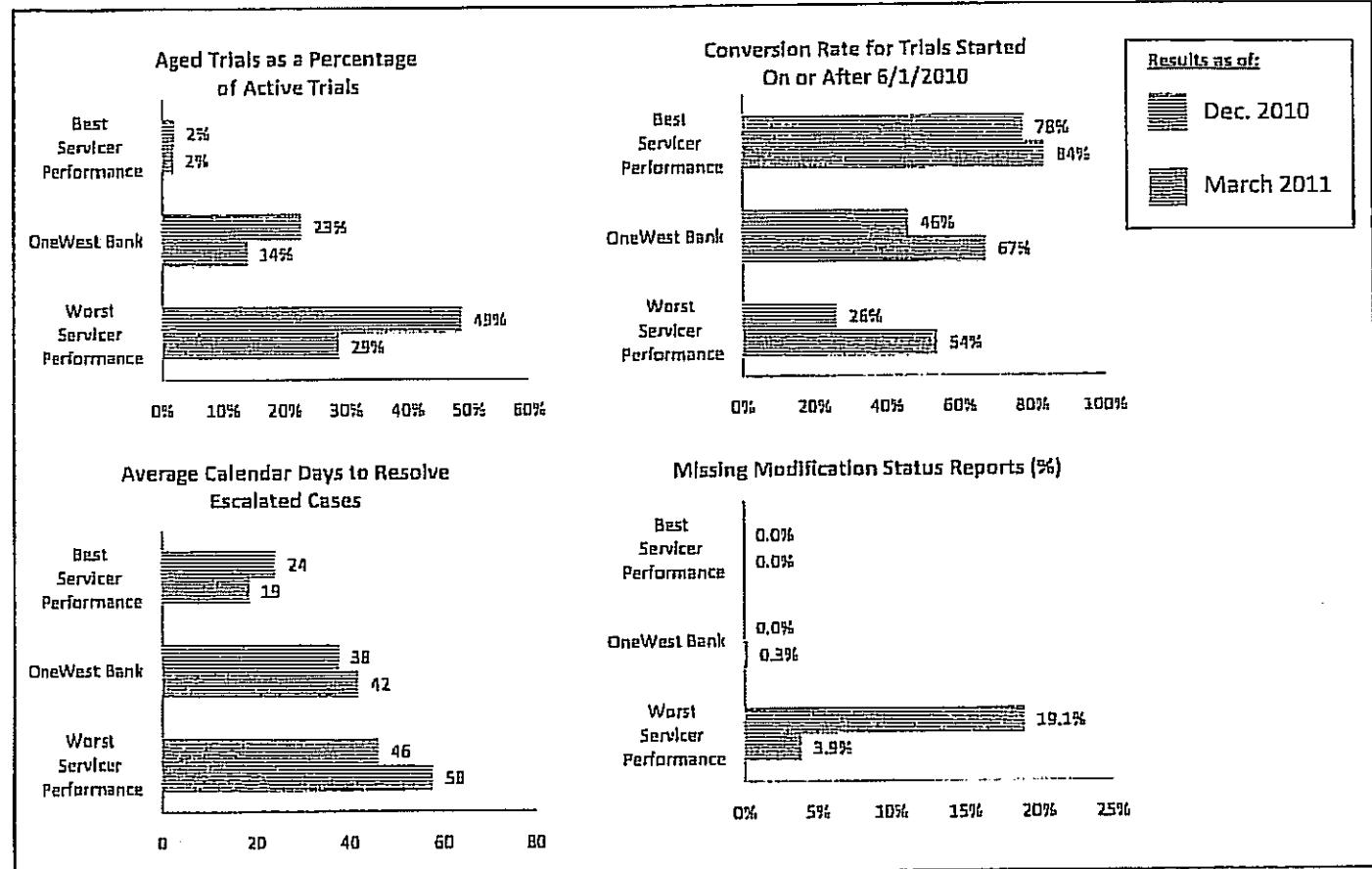
1 = Rating carried forward from prior quarter

Rating Legend		
	Met benchmark; minor improvement may be indicated	
	Did not meet benchmark; moderate improvement needed	
	Did not meet benchmark; substantial improvement needed	

Result	
<ul style="list-style-type: none"> • OneWest Bank has areas requiring moderate improvement. 	
<ul style="list-style-type: none"> • After considering all relevant factors, OneWest Bank servicer incentives will not be withheld at this time. 	
<ul style="list-style-type: none"> • Withholding may commence next quarter if OneWest Bank fails to demonstrate improvement in the next assessment. 	



MSA Servicer Assessment OneWest Bank Q1 Page 33 of 40
Program Results



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MHA Service Assessment Report for Select Portfolio Servicing of 40 Compliance Results

Overview

- These metrics reflect the results of compliance reviews of the servicer's adherence to MHA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

Performance Category	Metric	Benchmark	First Quarter 2011	
			Internal Controls	Ratings
 Identifying and Contacting Homeowners	 Second Look Discrepancy	Percentage of loans where Lender did not contact with the customer's MHA determination	< 4%	
	 Second Look Inside in Rejections	Percentage of loans rejected where Lender was unable to conclude on the customer's MHA determination	< 10%	
	 Internal Controls for Identifying and Contacting Homeowners	Lender's ability whether lending policies are conducted effectively and in accordance with MHA guidelines	***	
 Homeowner Evaluation and Assistance	 Income Calculation Error 5	Percentage of loans for which MHA's income calculation differs from the Lender's by more than \$1	< 5%	
	 Internal Controls for Homeowner Evaluation and Assistance	MHA assesses whether lending policies are conducted effectively and in accordance with MHA guidelines	***	
 Program Management, Reporting, and Governance	 Incentive Payment Data Errors	Average percentage of differences in calculated incentives resulting from data discrepancies between survey files and the MHA system record	< 5%	
	 Internal Controls for Program Management, Reporting, and Governance	MHA assesses whether lending processes are conducted effectively and in accordance with MHA guidelines	***	

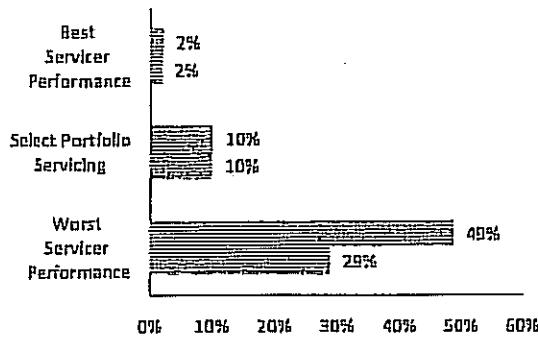
J = Rating carried forward from prior quarter

Rating Legend	
	Met benchmark; minor improvement may be indicated
	Did not meet benchmark; moderate improvement needed
	Did not meet benchmark; substantial improvement needed

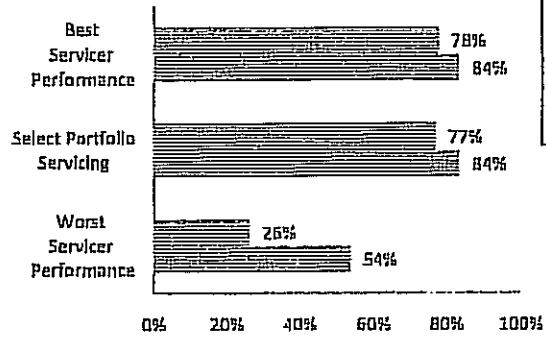
Result
• Select Portfolio Servicing has areas requiring moderate improvement.
• After considering all relevant factors, Select Portfolio Servicing servicer incentives will not be withheld at this time.
• Withholding may commence next quarter if Select Portfolio Servicing fails to demonstrate improvement in the next assessment.

MHA Services Assessment Select Portfolio Servicing of 40
Program Results

Aged Trials as a Percentage of Active Trials



Conversion Rate for Trials Started On or After 6/1/2010

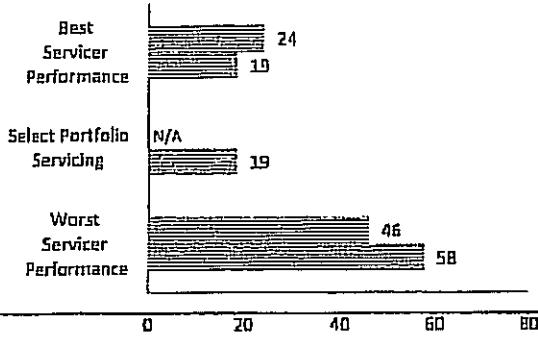


Results as of:

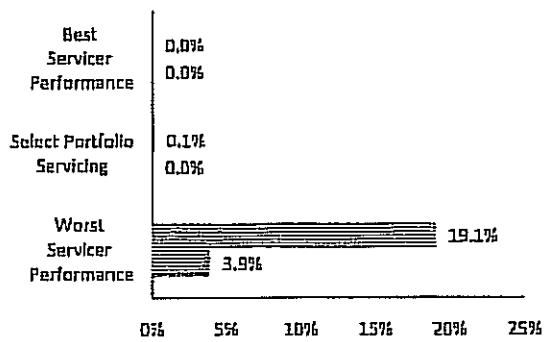
Dec. 2010
 March 2011

Average Calendar Days to Resolve Escalated Cases

Note: December 2010 data is unavailable for this servicer.



Missing Modification Status Reports (%)



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MHA Servicer Assessment of Wells Fargo Bank, NA **Page 36 of 40**

Compliance Results

Overview

- These metrics reflect the results of compliance reviews of the servicer's adherence to MHA Program Requirements.
- Quantitative results reflect percentages of tests that did not have a desired outcome.
- Servicers are rated qualitatively on the effectiveness of their internal controls in the three Performance Categories as well as for each quantitative result.

Performance Category

- Identifying and Contacting Homeowners**
Assesses whether the servicer identifies and communicates appropriately with potentially eligible MHA homeowners.
- Homeowner Evaluation and Assistance**
Assesses whether servicer correctly evaluates homeowners' eligibility for MHA programs, communicates decisions in a timely manner, and accurately executes appropriate MHA activities.
- Program Management, Reporting, and Governance**
Assesses whether the servicer has effective program management, governance processes, and timely and correct supplemental program reports and program information.

Metric

- Second Look % Disagree**
Percentage of loans reviewed where MHA-C did not agree with the servicer's "Safe Lending" analysis.
- Second Look % Unable to Determine**
Percentage of loans reviewed where MHA-C was unable to conclude on the servicer's "Safe Lending" analysis.
- Internal Controls for Identifying and Contacting Homeowners**
MHA-C assesses whether servicer identifies incentives are conducted effectively and in accordance with MHA guidelines.
- Income Calculation Error %**
Percentage of loans for which MHA-C's income calculation differs from the servicer's by more than 5%.
- Internal Controls for Homeowner Evaluation and Assistance**
MHA-C assesses whether servicer business processes are conducted effectively and in accordance with MHA guidelines.
- Executive Payment Data Errors**
Average percentage difference in stated and actual monthly payments (in thousands) between servicer files and the MHA system record.
- Internal Controls for Program Management, Reporting, and Governance**
MHA-C assesses whether servicer business processes are conducted effectively and in accordance with MHA guidelines.

Benchmark

First Quarter 2012	
Met	Met

1 - Internal controls testing was not performed for two consecutive quarters due to the cyclical nature of the audit process. To accommodate more consistent reporting in the servicer assessments, MHA-C will adjust the review testing schedule to ensure coverage in each six-month period.

2 - Rolling tested forward from prior quarter.

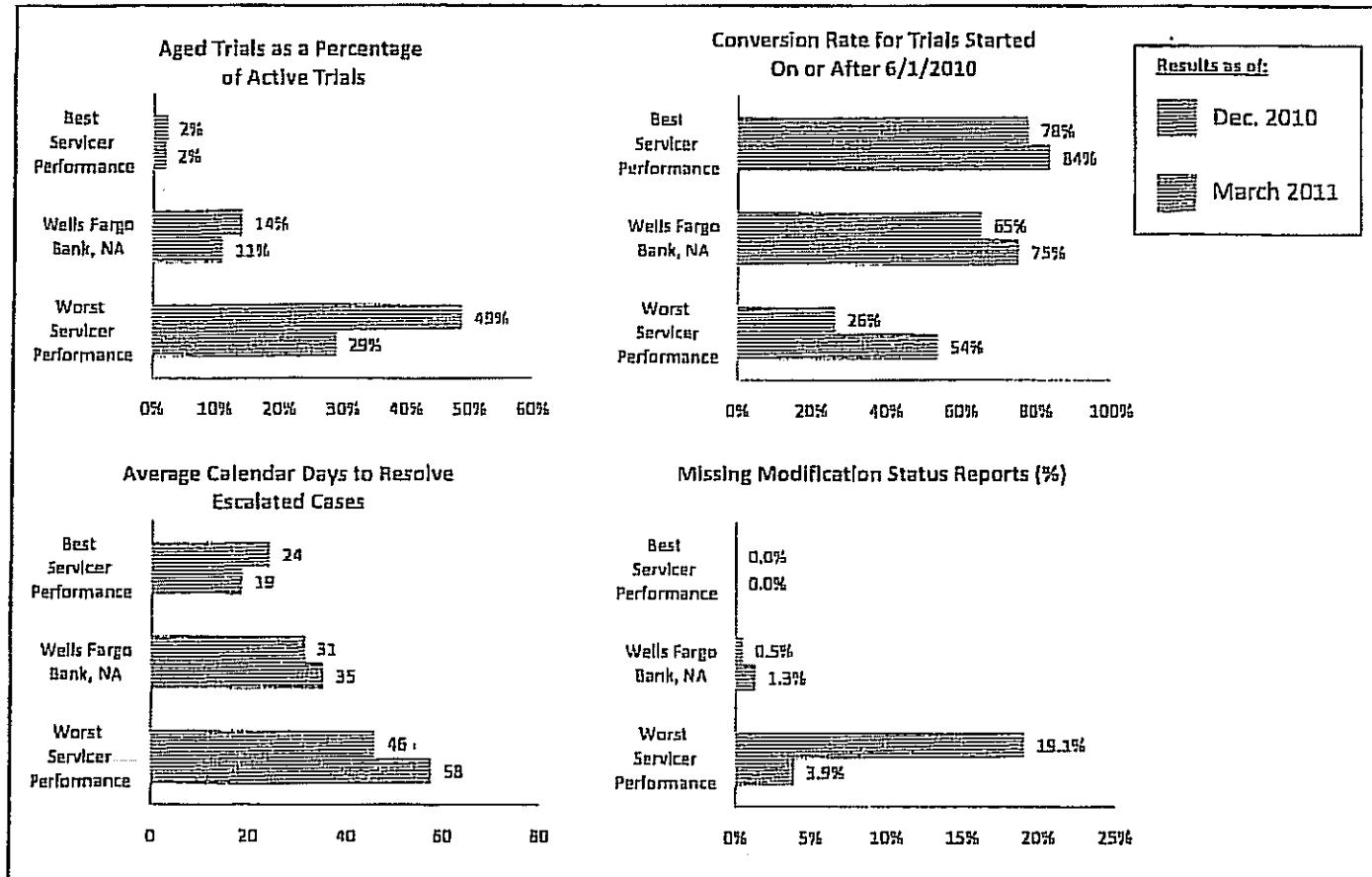
Rating Legend

- | |
|--|
| Met benchmark; minor improvement may be indicated |
| Did not meet benchmark; moderate improvement needed |
| Did not meet benchmark; substantial improvement needed |

RESULT

- Wells Fargo Bank, NA has areas requiring substantial improvement.
- After considering all relevant factors, Wells Fargo Bank, NA servicer incentives will be withheld at this time.
- Permanent reductions of incentives may commence in subsequent quarters if Wells Fargo Bank, NA fails to demonstrate improvement.

MHA Servicer Assessment - Wells Fargo Bank, NA
Program Results



Note: the best and worst performance reflect the best and worst result of the largest 10 servicers for the period. See appendix for descriptions of the metrics.

MHA Servicer Assessment Report 69-9 Filed 08/08/11 Page 38 of 40

Appendix

Metrics Descriptions

Compliance Metrics (quantitative)

Second Look % Disagree: Second Look is a process in which MHA-C reviews loans not in a permanent modification, to assess the accuracy of the servicer's determination of whether the homeowner is eligible for a modification. This metric measures the percentage of loans reviewed in Second Look with which MHA-C disagrees with a servicer's determination.

Second Look % Unable to Determine: This metric measures the percentage of loans reviewed in Second Look for which MHA-C is not able to determine, based on the documentation provided, how the servicer reached its loan-modification decision.

For both Second Look Disagree and Unable to Determine results, remedial actions Treasury requires servicers to take include, but are not limited to: reevaluating loans not offered HAMP modifications, submitting additional documentation to support the initial reason for denial of the modification, clarifying loan status, and engaging in systemic process remediation. For such results, servicers are also reminded of their obligation to suspend foreclosure of the loan until the unresolved items are remediated.

Income Calculation Errors: Correctly calculating homeowner monthly income is a critical component of evaluating eligibility for MHA, as well as establishing an accurate modification payment. This metric measures how often MHA-C disagrees with a servicer's calculation of a borrower's Monthly Gross Income, allowing for up to a 5% differential from MHA-C's calculations. For Income Calculation Error results, remedial actions Treasury requires servicers to take include, but are not limited to: correcting

income errors exceeding the 5% differential, requiring the servicer to review their own income calculation accuracy, enhancing policies and procedures, and conducting staff training on income calculation.

Incentive Payment Data Errors: Treasury pays incentives to servicers, investors, and homeowners for permanent modifications completed under MHA. Although intended for different recipients, all incentives are paid through the servicer. Data that servicers upload to the program system of record is used to calculate the incentives paid to servicers, investors, and homeowners. This metric measures how data anomalies between servicer loan files and the reported information affect incentive payments. For Incentive Payment Data Error results, remedial actions Treasury requires servicers to take include, but are not limited to: correcting the identified errors and correcting system and operational processes such that accurate data is mapped to its appropriate places in the program system of record.

Compliance Metrics (qualitative)

Servicers establish processes and internal controls to help ensure their compliance with Program guidance. For each of the performance categories, Treasury performs a qualitative assessment of those internal controls based on MHA-C's compliance reviews. That assessment evaluates the nature, scope, and potential or actual impact on homeowners resulting from instances of servicer non-compliance with its own internal controls. For ineffective internal controls, remedial actions Treasury requires servicers to take include, but are not limited to: identifying and reevaluating any affected loans, enhancing the effectiveness of internal controls, and conducting staff training on servicer procedures.

Program Metrics

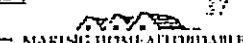
Conversion Rate: This cumulative metric looks at the rate of conversion to permanent modification for trials started on or after June 1, 2010, when all servicers were required to verify income documentation at trial start. Conversion rate is measured against all trials eligible to convert – those three months in trial, or four months if the borrower was at risk of imminent default at trial modification start. Permanent modifications transferred among servicers are credited to the originating servicer; trial modifications transferred are reflected in the current servicer's population.

Aged Trials as % of Active Trials: This monthly metric measures trials lasting six months or longer as a share of all active trials. These figures include trial modifications that have been converted to permanent modifications by the servicer and are pending reporting to the program system of record.

Days to Resolve Escalated Cases: This program-to-date metric measures servicer response time for homeowner inquiries escalated to the HAMP Solutions Center. Effective Feb. 1, 2011, a target of 30 calendar days was established for non-GSE escalation cases, including an estimated 5 days processing by HAMP Solutions Center. These figures include both GSE and non-GSE escalation results.

% of Missing Modification Status Reports: This monthly metric measures the servicer's ability to promptly report on modification status. Inconsistent and untimely reporting of modification status reports may impact incentive compensation and loan performance analysis.

For more information on the assessments, please visit www.financialstability.gov.



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Program Performance Report Through April 2011

APPENDIX A: NON-HAMP SERVICERS WITH HAFA

Servicers participating in the HAMP First Lien Modification Program may also offer additional support for homeowners, including Home Affordable Foreclosure Alternatives (HAFA), a forbearance for unemployed borrowers through the Unemployment Program (UP), and Principal Reduction Alternative (PRA).

Allstate Mortgage Loans & Investments, Inc.	Glass City Federal Credit Union	MerEquity, Inc.	Mexico
American Eagle Federal Credit Union	GMAC Mortgage, LLC	Mortgage Center, LLC	Technology Credit Union
American Home Mortgage Servicing, Inc.	Grafton Suburban Credit Union	Nationstar Mortgage LLC	The Golden 1 Credit Union
AMS Servicing, LLC	Great Lakes Credit Union	Navy Federal Credit Union	U.S. Bank National Association
Aurora Loan Services, LLC	Greater Nevada Mortgage Services	Oakland Municipal Credit Union	United Bank
Bank of America, N.A. ¹	Green Tree Servicing LLC	Ottoen Loan Servicing, LLC	United Bank Mortgage Corporation
Bank United	Hartford Savings Bank	OneWest Bank	Venture Capital, Inc.
Bay Federal Credit Union	Hillsdale County National Bank	ONNL Federal Credit Union	Vist Financial Corp.
Bayview Loan Servicing, LLC	HomEq Servicing	Park View Federal Savings Bank	Wealthbridge Mortgage Corp.
Bramble Savings Bank	HomeStar Bank & Financial Services	Pathfinder Bank	Wells Fargo Bank, NA ²
Cornington Mortgage Services, LLC	Iberiabank	PennyMac Loan Services, LLC	Westcom Central Credit Union
CCO Mortgage	IBM Southeast Employees' Federal Credit Union	PNC Bank, National Association	Yadkin Valley Bank
Central Florida Educators Federal Credit Union	IC Federal Credit Union	PNC Mortgage ³	
CitMortgage, Inc.	Idaho Housing and Finance Association	Purdue Employees Federal Credit Union	
Citizens 1st National Bank	IServe Residential Lending LLC	QLending, Inc.	
Community Bank & Trust Company	IServe Servicing Inc.	Quantum Servicing Corporation	
Community Credit Union of Florida	J.P. Morgan Chase Bank, NA ²	Residential Credit Solutions	
CUC Mortgage Corporation	Lake City Bank	RG Mortgage Corporation	
DuPage Credit Union	Lake National Bank	RoundPoint Mortgage Servicing Corporation	
Eaton National Bank & Trust Co	Liberty Bank and Trust Co.	Saxon Mortgage Services, Inc.	
Farmers State Bank	Utton Loan Servicing	Schools Financial Credit Union	
Fay Servicing, LLC	Los Alamos National Bank	SEFCU	
Fidelity Homestead Savings Bank	Magma Bank	Select Portfolio Servicing	
First Bank	Marix Servicing, LLC	ServisOne Inc., dba ESI Financial Services, Inc.	
First Financial Bank, N.A.	Midland Mortgage Company	ShareBank	
First Keystone Bank	Midwest Bank & Trust Co.	Silver State Schools Credit Union	
Franklin Credit Management Corporation	Midwest Community Bank	Specialized Loan Servicing, LLC	
Franklin Savings	Mission Federal Credit Union	Sterling Savings Bank	
Fresno County Federal Credit Union		Suburban Mortgage Company of New	

¹ Bank of America, NA includes Bank of America, NA, BAC Home Loans Servicing LP, Home Loan Services and Wilshire Credit Corporation.

² J.P. Morgan Chase Bank, NA includes EMC Mortgage Corporation.

³ Formerly National City Bank.

* Wells Fargo Bank, NA includes all loans previously reported under Wachovia Mortgage, FSB.

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Program Performance Report Through April 2011

Appendix A2: Participants in Additional Making Home Affordable Programs

Second Lien Modification Program (ZMP)	Franklin Savings	FHA Second Lien Program (FHA ZLP)
Bank of America, NA ¹	Gateway Mortgage Group, LLC	Bank of America, NA ¹
Bayview Loan Servicing, LLC	GMAC Mortgage, LLC	Bayview Loan Servicing, LLC
CitiMortgage, Inc.	Green Tree Servicing LLC	CitiMortgage, Inc.
Community Credit Union of Florida	Guaranty Bank	Flagstar Capital Markets Corporation
GMAC Mortgage, LLC	iServe Residential Lending, LLC	GMAC Mortgage, LLC
Green Tree Servicing LLC	iServe Servicing, Inc.	Green Tree Servicing LLC
iServe Residential Lending, LLC	James B. Nutter & Company	J.P. Morgan Chase Bank, NA ²
iServe Servicing, Inc.	J.P. Morgan Chase Bank, NA ³	Nationstar Mortgage LLC
J.P. Morgan Chase Bank, NA ²	M&T Bank	PNC Bank, National Association
Nationstar Mortgage LLC	Mark Servicing, LLC	PNC Mortgage ³
OneWest Bank	Marsh Associates, Inc.	Residential Credit Solutions
PennyMac Loan Services, LLC	Midland Mortgage Company	Saxon Mortgage Services, Inc.
PNC Bank, National Association	Nationstar Mortgage LLC	Select Portfolio Servicing
PNC Mortgage ³	Ocwen Loan Servicing, LLC	Wells Fargo Bank, NA ⁴
Residential Credit Solutions	PennyMac Loan Services, LLC	Rural Housing Service Modification Program [RD-HAMP]
Servis One Inc., dba BSI Financial Services, Inc.	PNC Mortgage ³	Banco Popular de Puerto Rico
Wells Fargo Bank, NA ⁴	RBC Bank (USA)	Bank of America, N.A. ¹
FHA First Lien Program (Treasury FHA-HAMP)	Residential Credit Solutions	Horizon Bank
Amarillo National Bank	Saxon Mortgage Services, Inc.	J.P. Morgan Chase Bank, NA ³
American Financial Resources Inc.	Schmidt Mortgage Company	Magna Bank
Aurora Financial Group, Inc.	Select Portfolio Servicing	Matrix Servicing, LLC
Aurora Loan Services, LLC	Servis One Inc., dba BSI Financial Services, Inc.	Midland Mortgage Company
Banco Popular de Puerto Rico	Stockman Bank of Montana	Nationstar Mortgage LLC
Bank of America, NA ¹	Wells Fargo Bank, NA ⁴	Wells Fargo Bank, NA ⁴
Capital International Financial, Inc.	Weststar Mortgage, Inc.	
CitiMortgage, Inc.		
CU Mortgage Services, Inc.		
First Federal Bank of Florida		
First Mortgage Corporation		

¹ Bank of America, NA includes Bank of America, NA, BAC Home Loans Servicing LP, Home Loan Services and U.S. HOME Credit Corporation.² J.P. Morgan Chase Bank, NA includes EMC Mortgage Corporation.³ Formerly National City Bank.⁴ Wells Fargo Bank, NA includes all loans previously reported under Wachovia Mortgage FSB.